



June 11, 2009

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COMMUNITY DEVELOPMENT

Tukwila Planning Commission
6300 Southcenter Blvd., #100
Tukwila, WA 98188

**Re: Westfield's Detailed Comments and Proposed Changes to
Tukwila's Draft Urban Center Plan**

Honorable Planning Commissioners:

As described in prior public testimony and in my May 28, 2009 letter, WEA Southcenter LLC ("Westfield") has serious concerns with the current draft of the Tukwila Urban Center Plan (the "Draft Plan"). Substantial revisions must be made to bring the Draft Plan into conformance with the City's adopted Comprehensive Plan, which calls for maintaining the strength of the retail sector while gradually introducing mixed use residential and office uses over the next 30-50 years.

Mr. Stephen Hamilton, Westfield's Vice President of Design and lead designer of Southcenter Mall's recent expansion, testified before the Planning Commission on April 23, 2009. He explained how various portions of the recent expansion would not have been permitted and would become nonconforming structures under the Draft Plan. He did not have time to cover all of his planned testimony, including how the Draft Plan would adversely affect Westfield's future expansion plans. To provide documentation of these concerns, we are submitting with this letter, as Exhibit A, Mr. Hamilton's written testimony outline.

We are also attaching to this letter a detailed list of comments and proposed changes to the Draft Plan. Exhibit B organizes these comments in a matrix form. Exhibit C provides specific marked-up pages from the Draft Plan.

The attached comments and proposed changes address specific provisions of the Draft Plan that adversely affect Westfield given its unique position as a regional mall. However, many of these proposed changes could be expanded to other retail properties, consistent with Westfield's testimony that the final TUC Plan should strengthen existing retail businesses in the TUC while focusing on encouraging residential uses near the train station and river.

EXHIBIT 16 DATE 6/11/09
PROJECT NAME TUC plan
FILE NO 109-008

1 of 2

Westfield is committed to working with staff and other stakeholders to revise the Draft TUC Plan to address our concerns and to meet the requirements of the existing Comprehensive Plan.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brent Carson", with a long horizontal flourish extending to the right.

Brent Carson

Enclosures

cc: Tukwila City Council
Jack Pace
Lynn Miranda
Nora Gierloff
David Gensemer
Stephen Hamilton

EXHIBIT A

NOTES ON PROPOSED TUKWILA URBAN CENTER PLAN STEPHEN HAMILTON, VICE PRESIDENT OF DESIGN, WESTFIELD

The following are summarized notes on the proposed Tukwila Urban Center Plan and its impact on Westfield Southcenter prepared by Stephen Hamilton, Vice President of Design, Westfield. Steve was the lead designer of the expansion project that opened in July, 2008. These notes were used in the oral presentation by Mr. Hamilton to the Planning Commission on April 23, 2009 and in meetings between Mr. Hamilton, other Westfield representatives, and Tukwila Planning staff.

Introduction

Overview – when Westfield came to Southcenter it was a successful traditional mall. Traditional meaning it was internally focused, turned its back to the street and was surrounded by surface parking.

Our goal was threefold:

1. Bring new vibrancy and energy to the center
2. Significantly expand the offerings and the types of amenities available - intensify the use
3. Open up the center and give it a public face

The resulting project evolved out of a coordinated effort between Westfield and City Planning Staff. The connection to Baker and possible future development here, and the reorientation and recognition of what may happen to the South of the mall were all addressed. We think the project is a very successful effort but one that, unfortunately and surprisingly, would not have been allowed under the draft TUC Plan.

Non Conforming components of the current expansion of Westfield Southcenter (Phase 1)

The following is a list, in no particular order and not comprehensive, to various components of the recent Westfield expansion that would not be permitted under the draft TUC Plan [*TUC Plan page references are incomplete*]:

1. All pad Buildings: not 2 story [*page 21*], not fronting on adjacent street [*23,52*] and setback distances [*36, 37,40*]
2. Bank of America drive through. If this plan had been in effect, there would have been no possibility of getting Bank of America to move locations. [*19*]
3. Firestone building: use restriction – automobile repair is not a permitted use in the Regional Center. [*19*]
4. Police sub-station is not a permitted use on the first floor in the Regional Center. [*19*]
5. Existing parking structures (Form regulation guidelines) [*19, 22, 23*] - required to have retail at base. [Single level retail is unclear as 2 story program is required - staff current interpretation is parking counts as program at level 2.] Retail at the ground level was considered, but there are serious drawbacks - will these tenants be viable?, and will the loss of at grade parking be detrimental to the new tenants and anchor stores?

6. All Existing Anchor store buildings (exceed maximum building size in urban corridor classification) [23, 32, 38]
7. Patio structures are non-conforming as they are not allowed external to the building under the Urban Corridor streets. [23] Patios are an important amenity for restaurant tenants to successfully operate their business.
8. AMC Theater - is 3 floors with a Mezzanine; height is about 75 feet. It does not comply with the proposed tower bulk regulation maximum diagonal distance of 300'. [21, 27]
9. Drive aisles do not conform to the Urban Corridor standards. At the south end of the expansion, the south side of street is in violation due to allowance of drive aisles for parking. [23]
10. We do not have parallel parking along the edges of any of our drive aisles. This is required by the TUC Plan. [23,40] Access for 14 million visitors a year would be severely impacted.
11. The street width is wider than allowed - any narrower would be in violation of Fire Code. Contradiction in requirements. [40]
12. Surface parking at south end of site would now be non-conforming. Several issues of customer access and tenant visibility. Especially true for the restaurant, theater and anchor tenants. [23, 52-55]
13. Maximum tenant width allowed in the Urban Corridor area is 50 feet. [23,32] Duke's, Joey's, BJ's, Racha Thai would all be in violation. Also, each of the anchor stores would be non-conforming as would Cheesecake, Olive Garden, Fidelity, and the bank.
14. Our south entrances, including the main atrium entrance with the large glass façade, the west entry next to Sears and the new east entrance, would each be non conforming as they are set back too far from the building line, See page 36 and Private Frontage types.[23, 36]

[Points 15-20 were not covered by Steve in his presentation on 4/23]

15. All building facades for the pads are non-conforming due to setback requirements. Potential loss of tenants due to tenant requirements not being met. [23, 36]
16. Proposed Tukwila Urban Center Plan document requires dedicated bike lanes but does not specify the location for these lanes, nor are they provided for in the new street standards. [?]
17. Open space requirement is not met, unless our current streets or internal corridors count - need approximately 2 acres of open space. [23, 43-45]
18. Landscape on rooftops does not exist today. This is a poor use of resources for an amenity most will never encounter. [23, 46-48]
19. Retail concepts with dropped ceiling height less than 15 feet are not permitted.[24]
20. Landscape at building front is not in conformance - trees are required at 30 cc max. Our spacing is greater at the entry and loading dock areas. [46]

I am sure that as we delve in more detail into the document we will discover more issues and other unintended consequences.

Notes on potential issues impacting future expansion of Westfield Southcenter

[The potential effect of the TUC Plan on future expansions was not covered at the Public Hearing due to lack of time]

Here is my list of potential issues impacting future expansions at the Southcenter Mall that we discussed with city planning. (Not listed in order of importance)

1. Maximum setback requirements could not be met as tenants want to be located close to the existing mall and the existing patterns of shopper circulation

2. Existing plan is unclear on which setbacks even apply – there are different requirements at Andover vs. Tukwila parkway vs. internal Urban street [23, 36, 37, 40, 52]
3. Multistory tenant buildings could not be met for all future tenants. Many future retailers will want to be located in single story buildings [21]
4. Necessary loading docks could not meet Urban street standards. [40]
5. Building entries could not meet private frontage types - [23, 36]
6. Could not have surface parking to the rear of all new expansion buildings. Convenient parking adjacent to the front door will be required to attract tenants.
7. Depending on the tenant, building size needs to be larger than allowed (the Existing Mervyn's building is non-conforming for example)
8. New tenant facades would need to exceed the 50' maximum. [23, 32] Tenants in future expansions will not want to "front" onto the designated Urban street. Most retailers want to operate with only one entry (mall facing); additional store entrances significantly increase operating cost.
9. For traffic circulation, we could not allow parallel parking on drive aisles. Also, the proposed standards for drive aisles would cause a significant loss of parking. [40]
10. As now drafted, a grocer would not be permitted in the Regional Center unless we also build 100 units of residential. [19] This residential requirement is a significant investment and would likely deter bringing a grocery store to the TUC Regional Center.

Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
2	<p>(General Comment)</p> <p>Introduction</p>	<p>1. The maps used in this plan reflect the tax parcel configuration of the Westfield Southcenter Mall prior to the recent Binding Site Plan approval. Please revise all maps to show correct lines, or remove all parcel lines on Mall property from all maps.</p>
		<p>1. Change this title: 1) District Structure – From <u>Sprawling Auto-Oriented</u> Commercial Area to Urban Center</p> <p>2. Change this sentence: The sprawling, entirely auto-oriented commercial zone is almost entirely built out, new investment will increasingly entail redevelopment.</p> <p>3. Change this sentence: The forces of market demand and land availability that produced these physical characteristics have evolved significantly in new directions. The primary driving forces conditioning the form of new investment in the Plan Area will be 1) the shopping industry's accelerating abandonment of exclusively auto-oriented shopping centers in favor of more open-air and amenity-driven formats, 2) 1) increasing regional commitment to transit, 3) 2) rapidly growing demand for walkable urban environments for living, working and shopping, and 4) 3) the escalating value-economic importance of property in the Southcenter area as a result of the expansion of the regional mall and the disappearance of easily developed property in the area.</p> <p>4. Change this sentence (the Mall may not be planning further southward or westward expansion): The area entering on surrounding Westfield Southcenter Mall will continue its transformation to transform into a more walkable and compact Regional Center; extending southward toward Strander Boulevard ultimately extending to the edge of Tukwila Pond, and eastward across Andover Park West.</p>
3	<p>The Envisioned Future Tukwila Urban Center: "Regional Center"</p>	<p>1. Change this paragraph: ... The Regional Center owes its success to and is anchored by the newly expanded and refurbished Westfield Southcenter Mall. <u>Mall customers arrive predominantly by car.</u> The drawing power of this retail powerhouse will continue to bring investment in retail, services and entertainment venues oriented to an expanding regional trade. <u>For this reason, this plan gives special emphasis to maintaining the economic viability of the Regional Center's hub, the Westfield Southcenter Mall. In recent years the Mall has shown leadership in enhancing the look and feel of the Mall through investments in architecture and customer amenities.</u></p> <p>2. Change this sentence: The area surrounding the newly refurbished super-regional mall <u>with public incentives initiated by the City</u> will begin</p>

Page	Section/Topic	Comment/Question
9	The Envisioned Future Tukwila Urban Center	<p>changing from the exclusively parking lot-surrounded, auto-dominated development that has begun to fall out of favor with market trends, in favor of an increasingly walkable and amenity driven pattern reflecting contemporary consumer and investor preferences.</p> <p>3. Change this sentence: <u>With public investment, New development surrounding the Mall</u> will be increasingly characterized by a pattern of walkable-scaled city blocks with key street frontages lined with visible storefronts...</p> <p>4. Remove this sentence: <u>Infill development on the high-value property of the Mall</u> will continue the transition from surface parking to structured parking, and will likely be increasingly characterized by mid-rise or high-rise building components built over the retail base.</p> <p>5. Remove sentence: <u>Ultimately, the current Mall's inward-focused development pattern will be reversed; its parking lots replaced entirely with the fine-grained and intensely developed patterns, that characterize the most sought-after urban districts.</u></p> <p>1. Change text as follows: <u>TUC Boulevards</u> As the old pattern of congestion-prone superblocks transitions to a pattern of smaller blocks that distribute traffic along an increasing amount of street surface and alternative routes, a finer-grained hierarchy of different street-types will emerge from the previously undifferentiated network. The most heavily used and visible of Southcenter's streets will be the wide district-crossing thoroughfares. Making the most of that visibility, two of the thoroughfares are intended to become the "front doors" of the urban center, providing pedestrian amenities and enfronting development that contribute powerfully to the form and character of Southcenter. First, Strander Boulevard will continue to be the most well-traveled east-west thoroughfare and the gateway for many visitors to the Regional Center, Pond District and TOD Neighborhood. <u>With the exception of the northern half of the street between Southcenter Parkway and Andover Park West, the entire segment of Strander Boulevard within the Plan Area is designated as a TUC Boulevard.</u> Of the several north-south arterials, Andover Park West provides the most direct connection to and through the Regional Center and the new Pond District. <u>With the exception of the western half of the street between Strander Boulevard and Tukwila Parkway, from Tukwila Parkway to south of the Pond, Andover Park West is designated as a TUC Boulevard.</u> New development along these two "TUC Boulevards" will be oriented toward the public right-of-way, and will provide wider sidewalks, generous planting strips and decorative boulevard-scale furniture (Photo 33). High vehicular capacity and comfortable walking environments will coexist in a framework of grand-scaled public street spaces that are spatially defined by sufficiently tall buildings and properly detailed building facades.</p> <p><i>Commercial Corridors</i> In order to insure that Southcenter provides opportunities for the full range of shopping industry development types,</p>

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Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
11	The Envisioned Future Tukwila Urban Center	<p>Southcenter Parkway and the TUC Regional Hub site (Westfield Southcenter Mall) will likely continue to service as Southcenter's commercial strip, providing sites for auto-oriented retail and services. To insure a sufficient number of opportunities to satisfy market demand for the types of auto-oriented venues that are inappropriate in the Regional Center, Pond District or TOD Neighborhood, 180th Street will also be designated as a potential location for stand-alone and auto-oriented formats, especially large-scale "big box," single tenant uses, as well as for uses requiring drive-up and drive-in facilities. As new development occurs, new improvements will provide modest new pedestrian amenities as well as beautification with indigenous landscaping.</p> <ol style="list-style-type: none"> Change this sentence: New pedestrian paths and public sidewalks will lead pedestrians from surrounding areas to the center, <u>such as the recently completed covered walkway leading from the transit center at Andover Park West and Baker Boulevard toward the Mall entrance, and the most heavily used route, from the center to the Mall, will be improved, with a covered walkway leading directly to the Mall entrance.</u> Change this sentence: 2) Build on the presence of major retail and Major Retail Centers, another uses to encourage the augmentation of existing shopping assets with the type of urban-amenity-driven, pedestrian-oriented shopping increasingly compatible amenity-driven shopping favored by consumers and investors. Add this sentence to the end of "Reinvestment Strategy": 11) City investment in public incentives or public parking to reach market feasibility of multi-storied mixed use development with structured parking.

BOOK II: Development Code

Page	Section/Topic	Comment/Question
13	18.28.003 Threshold for Conformance...	<ol style="list-style-type: none"> To the end of the first paragraph of section 18.28.003 add: <u>Tukwila Urban Center Regional Hub: New Construction and Expansion of Existing Structures shall not trigger full compliance to the Development Code for the entire site; rather the degree of compliance shall be limited in value and area proportionate to the new development or expansion, including limiting required improvements to a smaller area of the premise which is more equivalent to the percentage of total building being constructed. The Tukwila Urban Regional Hub consists of the Southcenter Mall, which is bounded by Tukwila Parkway to the north, Andover Park West to the east, Strander Boulevard to the south, and Southcenter Parkway to the west.</u> Change this sentence: ii) Major Retail Centers. Compliance with the above regulations is required when the combined costs stated on all submitted City permit applications for exterior alterations to an individual tenant space in major retail centers within any retailing <u>2-a one year period equals or exceeds \$100,000 50% of the replacement value of the tenant space</u> (unless the

Page	Section/Topic	Comment/Question
14		<p>work is covered under the exception section below).</p> <p>3. Change this sentence: Required improvements may be made as part of the alteration that triggers the required improvements. The cost of the landscaping standards that shall be met is limited to 10% <u>1%</u> of the value of the proposed alterations. It is the responsibility of the applicant to document to the DCD Director the value of the required improvements. Additional costs may be required to comply with other applicable requirements associated with the proposal.</p>
15	18.28.003 Thresholds for Conformance...	<p>1. Change this sentence: b) Substantial Alteration Threshold i) Substantial alteration occurs when the combined costs stated on all submitted City permit applications for any repair, reconstruction, rehabilitation, demolition, tenant improvements or other improvements to a structure within any rolling-2 year <u>a one year</u> period exceeds 50% of the <u>current value or replacement value</u> of the structure. Replacement values before the start of construction activity or before damage had occurred (if the structure was damaged and is being restored) shall be used.</p>
15	Figure 18.28.03 Conformance with Code	<p>1. Change this sentence: EXTERIOR ALTERATIONS - Major Retail Centers. Any exterior alteration of an individual tenant space in major retail centers when the combined costs stated on all submitted City permit applications within any rolling-2 year <u>a one year</u> period equals or exceeds \$100,000 <u>50% of the replacement value of the tenant space</u> (unless the work is covered under the exception section of the chapter *)</p> <p>2. Change this sentence: SUBSTANTIAL ALTERATIONS - Any repair, reconstruction, rehabilitation, or other improvements to a structure (unless the work is covered under the exception section of the chapter**) when the combined costs stated on all submitted City permit applications within any rolling-2 year <u>a one year</u> period exceeds 50% of the <u>replacement</u> value of the building or structure either before the start of construction or, if the structure has been damaged and is being restored, before the damage occurred, shall require compliance with all of the regulations of this chapter.</p> <p>3. From the "Exterior Alterations" Type of Development, remove the "X" from the following Standards and Regulations:</p> <ul style="list-style-type: none"> • Building Orientation • Private Frontage Types • Side Yard Setback • Rear Yard Setback

Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
		<ul style="list-style-type: none"> • Alley Setback • Site Components Regulations <p>4. Add the following reference below chart: <u>**** In the TUC Regional Hub new construction and expansion of existing structures shall not trigger full compliance for the entire site to the Development Code; rather the DCD Director will determine the degree of compliance, including limiting required improvements to a smaller area of the premise which is more equivalent to the percentage of total building being added, see 18.23.003.</u></p> <p>5. Amend Figure 18.28.03 to add **** to the following "Standards and Regulations that will be used to evaluate the project":</p> <ul style="list-style-type: none"> • Landscaping Regulations • Site Component Regulations • General Parking Requirements & Guidelines
18	18.28.011 Use Standards	<p>1. Add to the end of 18.28.011.1:</p> <p>iii) <u>The TUC Regional Hub—consisting of the Southcenter Mall, which is bounded by Tukwila Parkway to the north, Andover Park West to the east, Strander Boulevard to the south, and Southcenter Parkway to the west—is the economic anchor for the entire Tukwila Urban Center Plan area. Development in this block has unique architectural form and function: pedestrian spaces and shopfronts are provided both inside and outside; patrons visit multiple sites in a single trip; and visitors are offered a variety of retail and dining options within walking distance of one another. The TUC Plan recognizes that the TUC Regional Hub is a distinctive facility important to the continued vibrancy of the TUC Plan Area. Accordingly, certain development standards will not be applied in the Regional Center Hub.</u></p>
19	Use Standards Chart	<p>1. Change the Chart to add the following references under "Conditions":</p> <p><u>C10: Permitted on ground floor in TUC Regional Hub</u> <u>C11: Permitted outright in TUC Regional Hub</u> <u>C12: Allowed in TUC Regional Hub, if existing prior to adoption of this plan</u></p> <p>2. Change the following Conditions to uses in "Regional Center":</p> <ul style="list-style-type: none"> • <u>Retail—Pharmacy/Grocery Anchors (over 15k sf): (C2)</u> • <u>Retail—Repair Shops (commercial/automotive): (C12)</u> • <u>Retail—Business & Personal Services—Veterinary Clinic..., and doggy daycare: (C10)</u>

Page	Section/Topic	Comment/Question
21	Scale Standards Chart	<p>• Office—Professional: (C10) • Office—Medical and dental (outpatient only): (C10) • Office—Research: (C10) • Office—Government Services: (C10) • Lodging—Hotel, extended stays...: (C10) • Civic and Institutional—Education & Instructional Facilities: (C10) • Civic and Institutional—Convention/Exhibition Facilities: (C10) • Civic and Institutional—Religious Institutions: (C10) • Civic and Institutional—Fire and Police Stations: (C11) • Civic and Institutional—Daycare Center: (C10) • Residential—Multifamily: (C10) • Residential—Attached Single Family: (C10) • Special Use Configuration—Drive-in or Drive-thru...: (C12)</p> <p>3. Change this section: Notes N1: Other uses not specifically listed in this Title are permitted should the Director determine them to be: a) similar in nature to and compatible with other uses permitted outright within a District; and b) consistent with the stated purpose of a district; and c) consistent with the policies of the Tukwila Urban Center Plan N2: <u>Uses located within the TUC Regional Hub, which are accessed only via the interior pedestrian walkways of the mall are not subject to this Use Standards Chart.</u> N3: <u>Accessory uses such as lobbies or common areas for multifamily developments or lodging establishments are allowed on the ground floor</u></p> <p>1. Change “Legend” as follows: (A1) 1 floor & 25 ft (only for anchor or in TUC Regional Hub) ... (A3) <u>Except in the TUC Regional Hub, floors above 12 must be residential uses or housing, or, residential uses or housing equal in area to the total non-residential square footage on floors 13 through 18 must be constructed in the Urban Core or General Urban zones. If affordable or senior housing is constructed, the required area may be reduced by up to 1/3 by the DCD Director as a special permission decision.</u> (A4) Does not apply in TUC Regional Hub</p> <p>2. Change references to the following Regulations under “Urban Core Standards”: • 18.28.031 Building Height—Minimum Height: 2 floors & or 25ft (A1) min • 18.28.032 Special Height Limits—TUC Blvd Edge (within 65 feet): 4 floors and 54 ft max 6 floors and 84 ft max • 18.28.033 Maximum Tower Bulk—Maximum Diagonal: A4</p>

Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
22	18.23.013 Form Map	<ul style="list-style-type: none"> • 18.28.034 Maximum Block Size—Provision of New Streets: A4 <p>1. Change Form Map as shown in attached figure, changes include:</p> <ul style="list-style-type: none"> • Change all corridor types bordering the TUC Regional Hub to “Commercial Corridor” • Remove all Special Corner Locations at the TUC Regional Hub • Remove all “Shopfront Required” designations along Andover Park West and Strander Blvd • Remove all pre-located streets from TUC Regional Hub <p>2. Fix typo in Form Map Legend—Special Corner Location: Special Corner Location (Section 18.28.04107)</p>
23	Form Standards Chart	<p>1. Suggestion: add a citation number to Form Standards Chart</p> <p>2. Edit Chart to add the following references under “Conditions”: <u>C6: Does not apply in TUC Regional Hub</u> <u>C7: Does not apply in TUC Regional Hub, except for buildings within 15 feet of a public right-of-way.</u></p> <p>3. Add the new references to the following Regulations under “Commercial Corridor Standards”:</p> <ul style="list-style-type: none"> • 18.28.042 Public Frontage Improvements, required or not required: <u>C6</u> • 18.28.046.9 Private Frontage Types, a) shop-front: <u>C7</u> • 18.28.046.9 Private Frontage Types, b) corner entry: <u>C7</u> • 18.28.046.9 Private Frontage Types, c) Grand Entry: <u>C7</u> • 18.28.046.102.2 Building Length Massing: <u>C7</u> <p>4. General Comment: Westfield has requested all corridor types abutting the TUC Regional Hub be changed to “Commercial Corridor” and all Special Corner Locations be removed. Westfield is not commenting specifically on the “TUC Boulevard” corridor standards or the Special Corner Locations standards at this time, but will provide detailed comments on these standards if future drafts of this TUC Plan make the TUC Regional Hub subject to TUC Boulevard corridor requirements or Special Corner Locations.</p>
24	18.28.021 Use Category Definitions	<p>1. 18.28.021 Use Category Definitions, (1) Retail Change this sentence:</p> <p>i) Definitions (1) Anchor: A large store that generates a significant number pedestrian traffic and that increases the traffic of shoppers at or near its location. Consumers, attracted by the anchor store, are likely to visit the location, and thus nearby stores’ sales</p>

Page	Section/Topic	Comment/Question
		<p>and profits are increased by the presence of the anchor.</p> <p>2. 18.28.021 Use Category Definitions, (1) Retail—Change this sentence: i) Special Conditions (i) Minimum interior height for ground level retail of all types is 15 feet from floor-to-dropped ceilings, and 18 feet from floor to floor plate <u>and the structural ceiling may be no lower than 15 feet.</u> Use conversions in an existing building are not required to meet this requirement.</p>
26	18.28.030 Scale Regulations	<p>1. To 18.28.032 Special Height Limits, amend the sentence as follows: 2) TUC Boulevard Edge Limit i) This Special Height limit applies to all development located within 65 feet of the back-of-sidewalk indicated on Figure 18.28.012 Scale Map, <u>with exceptions noted.</u></p>
27	18.28.035 Permitted Corridor Types...	<p>1. Comment: please add a definition of "New Streets" to clarify that these are not necessarily public streets and can be converted from existing drive aisles.</p>
29, 30	18.28.042.4 Public Frontage Types	<p>1. General Comments for Urban Corridor and Commercial Corridor Types: Tree spacing could interfere with tenant visibility and a more flexible requirement that results in the same ultimate number of trees would be preferable. Light fixture heights will need to be carefully coordinated with available fixtures, spacing and height. The prescribed heights may result in undesirable, unintended consequences. A performance standard rather than a prescriptive standard would be more appropriate.</p>
31	18.28.043 Private Frontage Types	<p>1. Regarding (7) Weather Protection, change this sentence: ii) Weather protection shall create a covered pedestrian space a minimum of 5 feet in depth, with an overhead clearance between 8 and 12 feet, <u>unless otherwise allowed.</u> See Section 18.28.103...</p>
32	18.28.043.9 Private Frontage Types	<p>1. Under (A) Shopfront, change this paragraph: ...Shopfront and awning design should vary from shopfront to shopfront, <u>but a single building may have a uniform design theme</u> (see Section 18.28.043.7 Weather Protection for additional standards and guidelines on awnings and canopies). Shopfronts are built up to the back of the public sidewalk, and any setback areas must be treated as extensions of the sidewalk space. Recessed entrances are permitted with a maximum width of 15 feet. Restaurant shopfronts may set back a portion of the shopfront façade to create a colonnaded outdoor dining alcove that is a maximum of 12 feet deep. The set back portion of <u>the</u> façade that is oriented toward the street must have display windows. The alcove must also have</p>

Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
33	18.28.043.9 Private Frontage Types	<p>columns along the sidewalk at a maximum spacing of 15 feet on center. <u>In the TUC Regional Hub, the maximum depth of a dining alcove may exceed 12 feet and the maximum spacing of the alcove columns may exceed 15 feet, as long as the design meets the intent of this section.</u></p> <p>1. Under (C) Arcade, add the following text to the end of the paragraph: <u>In the TUC Regional Hub the minimum depth and maximum spacing of columns may exceed these standards, as long as the design creates a pedestrian scale with a defined covered area.</u></p>
36	18.28.044 Setbacks	<p>1. Under Front Yard Setback, amend the sentence as follows: b) Regulation i) All development shall be sited such that minimum and, <u>if applicable</u>, maximum Front Yard Setback dimensions are met.</p> <p>2. Under Side Yard Setback, add the following text: a) Definition i) Side Yard Setback is defined as the distance from the side property line to any building as shown in Figure 18.28.044.2 Side Yard Setback. <u>There are no Side Yard Setbacks for interior lot lines of a binding site plan.</u></p> <p>3. Under Rear Yard Setback, add the following text: a) Definition i) Rear Yard Setback is defined as the distance from the rear property line to any building as shown in Figure 18.28.044.3 Rear Yard Setback. <u>There are no Side Yard Setbacks for interior lot lines of a binding site plan.</u></p>
37	18.28.047 Special Corner Location	<p>1. Under Special Corner Location "Regulation," fix the typo: i) Development at Special Corner Locations shall include buildings that satisfy Section 18.28.049-6 Build to Corner Requirements.</p>
39-42	18.28.050 Street Regulations	<p>General Comment: Westfield has requested all pre-located New Streets to be removed from the TUC Regional Hub. Westfield is not commenting specifically on the New Street Types at this time, but if future drafts of this TUC Plan make the TUC Regional Hub subject to New Streets requirements, Westfield will provide detailed comments at that time.</p>
43	18.28.060 Open Space Regulations	<p>1. To 18.28.061 Provision of Open Space Chart add the following reference to the Legend: <u>(A1) Does not apply in Tukwila Urban Center Regional Hub</u></p>

Page	Section/Topic	Comment/Question
46	18.28.070 Landscaping Regulations	<p>2. Add the <u>(A1)</u> reference to "Retail" under "Regional Center"</p> <p>1. Front Yard Setback Area Landscaping Types, Change this sentence: i) Provide paved pedestrian areas along the back-of-sidewalk that enhance/enlarge the public frontage. Landscaping treatment shall consist of: (1) Front setback areas paved as extensions of the public <u>or private</u> sidewalk.</p>
54	18.28.093 General Parking Requirements	<p>We have several general questions and concerns about how Vehicular Access and Parking Lots standards will be applied to the Mall:</p> <p>1. Vehicular Access 18.28.093.1.ii.1--Curb Cuts and Driveways, change this section: ii) Curb Cuts and Driveways (1) When access to parking facilities and loading areas are provided from front or side streets, the maximum number of curb cuts associated with a single development, shall be one two-lane curb cut or two one-lane curb cuts. <u>This requirement does not apply in the TUC Regional Hub.</u> (2) The maximum width of driveways/curb cuts is 12 feet for a one-lane and 24 feet for a two-lane driveway. In the Workplace District, the maximum width of driveways/curbs is 35 feet. <u>This standard may be varied to allow for truck maneuvering and fire access.</u> (3) The total width of parking access openings on the ground level of structured parking may not exceed 30 feet. <u>This requirement does not apply in the TUC Regional Hub.</u> (4) Driveways shall be set back a minimum of five feet from adjoining properties (unless the driveway is shared with adjacent premises), and a minimum of three feet from adjacent buildings.</p> <p>2. Parking Lots—Setbacks & Landscaping: change this section: a) Setbacks & Landscaping i) Surface parking lots shall setback a minimum of five feet from any back-of-sidewalk, open space, or building facade. The setback shall be planted with Visual Softening Informal/Formal landscaping, as defined in Section 18.28.071.2 Landscaping. ii) Surface parking lots shall be buffered from adjacent commercial development with Moderate Screening (see Section 18.28.071.3 Landscape Types). iii) Surface parking lots shall be buffered from adjacent residential development with Heavy Screening in the side and rear setback areas (see Section 18.28.071.3 Landscape Types).</p> <p>Additions comments: The requirement for landscape in the parking fields will have a negative impact on</p>

Page	Section/Topic	Comment/Question
		<p>the ability of Westfield to meet department store requirements for parking and visibility. This entire section should be revised to represent a standard more accommodating of retail developments. Generally, the City should rethink the application of screening in a mixed-use district. Some screening might be appropriate between abutting properties in different use zones.</p> <p>3. Parking Lots—Setbacks & Landscaping 18.28.093.2.a.ix: Rooftop landscape requirements will eliminate the economic ability to provide rooftop parking</p> <p>vi. <u>For surface parking lots located in the TUC Regional Hub:</u></p> <p>(1) <u>A minimum of 15 square feet of interior parking lot landscaping is required for each parking stall.</u></p> <p>(2) <u>Landscape islands shall be placed at the ends of each row of parking to protect parked vehicles from turning movements of other vehicles.</u></p> <p>(3) <u>To subdivide continuous rows of parking stalls, landscape islands shall be placed at a minimum spacing of one island every ten parking spaces or within 100 feet of each car.</u></p> <p>(4) <u>Trees shall be planted in curbed landscaped islands or in flush tree wells with tree guards.</u></p> <p>v) <u>The minimum size for interior parking lot landscape islands is 100 square feet. Landscape islands shall be a minimum of 6 feet in any direction and generally the length of the adjacent parking space.</u></p> <p>vi) <u>A minimum of one evergreen or deciduous tree is required per landscape island with the remaining area to contain a combination of shrubs, living groundcover, and mulch. See also General Landscaping Requirements and Guidelines in Section 18.28.080 under Site Design section.</u></p> <p>vii) <u>Raised curbs or wheel stops shall be used adjacent to tree wells and planter areas to protect landscaping from car overhangs.</u></p> <p>4. Move the following Requirements to the Guidelines Section (see page 55):</p> <ul style="list-style-type: none"> • 2) Parking Lots a) Setbacks & Landscaping ix) Rooftop Parking Landscaping • 2) Parking Lots b) Pedestrian Circulation i) through iii)
55	18.28.094 General Parking Guidelines	<p>1. Parking Lots—Landscaping: add text (from page 54):</p> <p>1. <u>Rooftop Parking Landscaping. For a parking area on the top level of a parking structure, one planter that is 30 inches deep and 5 feet square should be provided for every 8 parking stalls on the top level of the structure. Each planter should contain a small tree or large shrub suited to the size of the container and the specific site conditions, including dessicating winds. The planter should be clustered with other planters near driving ramps or stairways to maximize visual effect.</u></p> <p>2. Parking Lots—Pedestrian Access: add text (from page 54):</p> <p>ii) <u>Parking Lots should provide clear pedestrian-only circulation routes between main building entrances and</u></p>

Page	Section/Topic	Comment/Question
65	18.28.102 Building Mass Standards and Guidelines	<p><u>sidewalks.</u></p> <p>a. <u>Front surface parking lots should provide such routes at a maximum spacing of every 300 feet.</u></p> <p>iii) <u>Pedestrian circulation routes through surface parking lots should be a minimum of 6 feet in width and separated from vehicular areas by curbing and landscaping. High traffic walkways should be wider.</u></p> <p>iv) <u>Decorative, contrasting paving, such as pavers, bricks, stamped asphalt, or scored concrete, may be used where pedestrian circulation routes cross driveways or other paved areas accessible to vehicles.</u></p> <p>3. Sustainability 18.28.094.4.i: change text: 1) <u>Parking lots should utilize permeable paving systems and bio-filtration swales should be utilized wherever possible feasible.</u></p>
67	18.28.103 Architectural Elements Regulations— Facades	<p>1. Length and Massing Elements-Requirements 18.28.102.2.b: While façade offsets, pilasters and notches are specific way to reduce the scale of buildings, the intended effect can also be achieved by varying materials, textures and other surface treatments. This solution does not appear in this section as an acceptable alternative, but this method is often the preferred solution for retailers as there are potentially fewer architectural elements to block visibility into stores. Please add an option to this list for a “Flush Surface” breakup.</p> <p>1. Façade Standards 18.28.103.Façade Standards.a: Change this sentence: Overall wall composition for Street, Pond, or River facades shall contain at least 20% glazed area (not including parapet walls or storefronts) in order to provide daylighting into tenant space and minimize black walls facing sidewalks.</p> <p>2. At 18.28.103.1.b.iv: Change this sentence: Weather protection, such as awnings, canopies or building overhangs on facades facing sidewalks, shall be a minimum 5 feet in depth, but should occupy no more than 2/3 of the total sidewalk width. The depth should depend on its function. Canopies or awnings shall have an overhead clearance between 8 to 12 feet. <u>Overhead clearance of up to 16 feet is allowed in the TUC Regional Hub.</u> Vinyl or plastic awning, and translucent awnings with interior lighting are not permitted.</p> <p>3. At 18.28.103.Façade Standards.e: Add the following text: iv) <u>Canopy or awnings at main entrances may exceed maximum overhead clearances standards listed above.</u></p> <p>4. At 18.28.103.Façade Standards.g: Add the following text: iv) <u>Where all building sides face a primary street, such as at the TUC Regional Hub, service entrances and</u></p>

Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009

Page	Section/Topic	Comment/Question
		<u>associated loading docks and storage may be located at the front of a building, but shall be separated and architecturally screened from any pedestrian entrances.</u>
69	18.28.103 Architectural Elements Regulations— Facades	<p>1. Regarding 18.28.103.Facade Guidelines.b.4: Trellises and canopies are often used to accent a building and articulate the façade. In these cases a complimentary or even contrasting color to the building would be more appropriate then matching the same color of the building.</p> <p>2. At 18.28.103.Facade Guidelines.b.8: Change this sentence: Balconies and porches should be constructed of materials and proportions related to the overall façade composition. A contrasting material to the wall surface should <u>may</u> be used.</p>
70	18.28.103 Architectural Elements Regulations— Facades	<p>1. At 18.28.103.Facade Guidelines.c.ii.5: Change this sentence: For individual buildings or portions of buildings intended to appear as individual buildings, materials used as primary cladding should be limited in number – one or two maximum in most cases <u>though more that two materials may be used if the architectural design avoids a cluttered appearance.</u></p> <p>2. Regarding 18.28.103.Facade Guidelines.d.i.1: Many contemporary retailers prefer horizontal proportions. Such vertical proportion requirements for parking garages will unnecessarily increase cost and could obstruct visibility in and out of the garage. This limiting of visibility could lead to a security issue. Please consider revising, and please clarify the 1:3 and then later the 3:2 to 2:1 requirements.</p>
71	18.28.103 Architectural Elements Regulations— Facades	<p>1. Regarding 18.28.103.Facade Guidelines.d.i.2.a: Many contemporary retail buildings incorporate windows that have no sills or lintels, please consider revising this section or providing and exception for the TUC Regional Hub.</p>
72	18.28.103 Architectural Elements Regulations— Facades	<p>1. At 18.28.103.Roof Standards.c.ii: Change this sentence: Roof top equipment must be set back a minimum of 10 feet from building walls, <u>or</u> screened from view, on all sides, and integrated into the overall building design.</p>

BOOK III: Implementation Strategy and Actions

Page	Section/Topic	Comment/Question
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Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to Tukwila Urban Center Plan - Public Review Draft, Feb 2009

75	Implementation Strategies	<p>1. Revise this section: <u>The feasibility of this</u> The success of the Tukwila Urban Center Plan and the vision it presents will be supported by is highly dependent on the City's <u>city</u> actions and investments outlined in this chapter of the Tukwila Urban Center Plan. Unlike private investment, City actions and investments can be strategically timed, scheduled and directed to specific areas and projects to further revitalization. The intertwining of regulatory control (contained in Book II) with the strategic investment of limited public resources (planned in this chapter, Book III) is intended to accelerate the redevelopment strategies (contained in Book I) and add to the appeal and success of Southcenter as a great place.</p>
79	3.1 Public Space and Amenity Projects	<p>1. Question regarding section (i) Elements, is the "grand public street" going to extend onto the Mall property? Please amend the sentence as follows: (2) Orientation: The esplanade shall be connected to Strander Boulevard and to the Mall along a grand public street, designed with public amenities and preferably with a central median as a linear open space connection. <u>The grand public street esplanade shall be extended as far as Strander Boulevard, across from the Mall's entrance.</u></p>

APPENDIX

Page	Section/Topic	Comment/Question
81	3.3 Mass Transit Network and Facilities	<p>1. General Comment: this section reflects conditions present before the Mall's major expansion. Please rewrite to reflect current conditions.</p>
89	Figures A.3-A.5	<p>2. Figures A.3-A.5: please update figures to include the Mall Expansion 3. Figure A.5: please update figure to include 1-story Bahama Breeze restaurant building</p>
91	A.5 Development and Redevelopment Possibilities	<p>1. Figure A.6 Vulnerability to Change: this figure is problematic. What does "vulnerable to change" mean? It seems to be a subjective label, and one Westfield disputes for the Southcenter Mall. Please remove this coloring from the Mall property, or change label to remove the term "vulnerable"</p>
93	A.6 Local Transportation and Circulation	<p>1. Amend the following sentence as follows: (2) Pedestrian Circulation Pedestrian activity is almost nonexistent in Southcenter, <u>except for within the covered walkways of the Westfield Southcenter Mall. Otherwise, pedestrian activity is limited to the brief walks taken by people walking to their jobs of to shopping designations from transit.</u></p>

**Exhibit B - Westfield's 6/11/09 Comments and Proposed Changes to
Tukwila Urban Center Plan - Public Review Draft, Feb 2009**

Page	Section/Topic	Comment/Question
97	A.9 Conclusion	1. Amend the following sentence as follows: There are very few places to gather or meet other than in the hallways <u>interior pedestrian corridors</u> of the Mall.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

1.1 INTENT

The Southcenter area serves many functions for the citizens of Tukwila. It is the city's primary commercial hub, drawing customers from within the community and all over the region. It is a workplace center, providing jobs to residents and nearby communities. And it is a major contributor, through property and sales tax, to local government and the services it provides to all citizens. It is the intention of the Tukwila community and the purpose of this Plan to bolster, extend and built upon these valuable functions, and to realign the Plan Area as needed with new forces of change and market demand. More specifically, it is the community's intention to:

- 1) Bolster Tukwila Urban Center's market position as the primary regional shopping center for South King County.
- 2) Establish a planning framework that insures that each new increment of new investment adds to the long term sustainability of Southcenter as a part of the city and region.
- 3) Encourage the eventual redevelopment of underutilized properties and oversized parking lots into a pattern that connects the project areas' key anchors and overlooked amenities to each other and to new infill commercial, residential and public spaces.
- 4) Substantially enhance the walkability of the northern Southcenter area, augmenting the exclusively auto-oriented environment with pedestrian amenities, transit and bicycle facilities.
- 5) Stimulate pioneering residential development in walking distance of the commuter rail station, and configured to provide safe and comfortable pedestrian routes to and from the station and other Southcenter destinations.
- 6) Enhance the convenience, visibility, accessibility and visual character of the transit infrastructure in Southcenter, and integrate that transit infrastructure with the pattern of development in the urban center.
- 7) Realign policies conditioning development in Southcenter with contemporary consumer and investor preferences.
- 8) "Unearth" Tukwila Pond and the portion of the Green River that passes through Southcenter; restoring, where necessary, their natural health and beauty, and featuring them prominently as amenities that enhance the identity and drawing power of Southcenter.
- 9) Restore the visual character of Southcenter to reflect the special landscape and architectural heritage of the Pacific Northwest region.

1.2 STARTING POINT: EXISTING CONDITIONS

The condition of the Plan Area at the inception of this Subarea Plan is detailed in Appendix A. Ultimately, the implementation of the planning framework contained herein will result in sufficient modification of these conditions as to make this Plan obsolete. At that point, a newly updated *Tukwila Urban Center Subarea Plan* will need to be prepared to engage the problems and opportunities presented by the modified existing conditions. As change occurs, the community intends to measure those changes against the conditions recorded herein to monitor the Plan's success and the degree to which it remains sufficiently current.

1.3 THE ENVISIONED FUTURE TUKWILA URBAN CENTER

The Tukwila Urban Center is composed of 244 individual privately held properties, and over 8 miles of public rights-of-way that are under the ownership and control of the City. The overarching purpose of the Subarea Plan is to orchestrate individual public and private investments to produce greater value than any separate project could practically achieve by providing a common purpose that all investors can rely upon, contribute to, and derive value from. This section describes the common purpose to which all investments shall be directed: the realization of a vision of the future that is sufficiently specific to provide a common purpose, yet loose enough to respond to opportunities and changes in the marketplace that will inevitably arise.

1) District Structure - From Sprawling Commercial Area to Urban Center

The northern portion of the Plan Area at the time of plan adoption exhibits the characteristics of the typical regional shopping center - a super-regional shopping mall surrounded by parking lots and by rings of associated smaller scale, single story, surface-parked commercial buildings. The southern portion of the Plan Area is primarily a warehouse and distribution center serving the mall and the region, featuring interspersed retail (especially furniture) outlets, along with some office buildings, primarily low-rise and surface parked. In addition, larger scale commercial centers and "big box" retailers have been increasingly dispersed in the central and southern portions of the Plan Area. The sprawling, entirely auto-oriented commercial zone is almost entirely built out, new investment will increasingly entail redevelopment.

The forces of market demand and land availability that produced these physical characteristics have evolved significantly in new directions. The primary driving forces conditioning the form of new investment in the Plan Area will be 1) the shopping industry's accelerating abandonment of exclusively auto-oriented shopping centers in favor of more open air and amenity-driven formats, 2) increasing regional commitment to transit, 3) rapidly growing demand for walkable urban environments for living, working and shopping, and 4) the escalating value of property in the Southcenter area as a result of the expansion of the regional mall and the disappearance of easily developed property in the area. The implementation of this Subarea Plan is intended to enable Southcenter to benefit from these primary conditioning forces.

Responding to these forces of change, the community envisions growth in Southcenter increasingly taking on a more compact and differentiated form, see Figure 1.1 Envisioned District Structure. The area centering on Westfield Southcenter Mall will continue its transformation to a more walkable and compact Regional Center extending southward toward Strander Boulevard ultimately extending to the edge of Tukwila Pond, and eastward across Andover Park West. In response to the region's enhanced commitment to transit service, a new Transit Oriented Neighborhood will extend from the relocated and upgraded transit center across Andover Park East. City improvements to water quality and pond amenities will help instigate the "unearthing" of Tukwila Pond not only as a public amenity, but as an "amenity anchor" for the southern edge of the Regional Center and as the center of a new mixed use Pond District. In addition, Southcenter Parkway will continue to feature auto-oriented retail and services, and the large center of the Plan Area will continue to provide a wide range of distribution, warehousing, and furniture outlets with incremental infill by office and other complementary commercial uses.

The particular characteristics envisioned for each of these districts and special corridors are specified in more detail in the following sections.

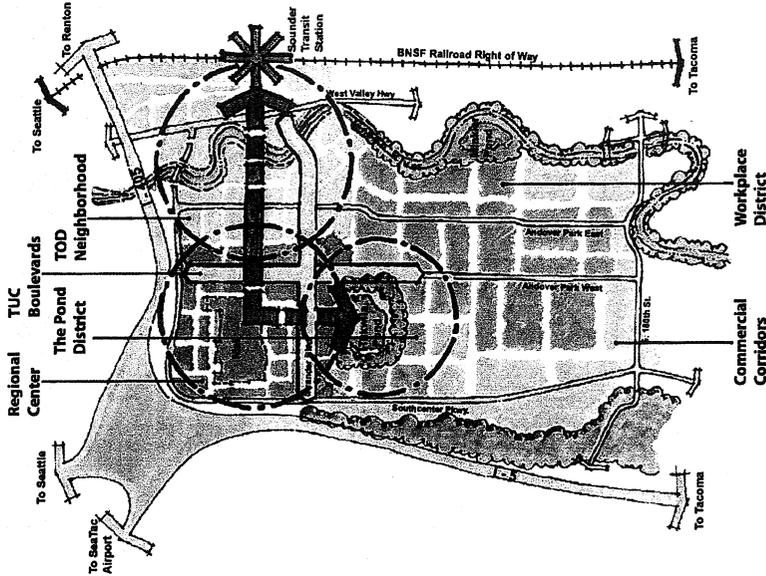


FIG. 1.1 ENVISIONED DISTRICT STRUCTURE

The existing haphazard distribution of development types is restructuring into a pattern in which development types are organized by district structure. All districts are scaled to walking distance, and connected by a network of interlinked streets and primary public spaces.

EXHIBIT 1.2 DATE 6/11/09

PROJECT NAME TUC Plan

FILE NO L-09-008

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

The Regional Center

The Regional Center portion of the Subarea Plan is the primary shopping and entertainment destination for South King County, and the centerpiece of the Southcenter area. It occupies the highly visible and accessible northwestern quadrant of Southcenter, which is nestled snugly up against the intersection of Interstate 405 and Interstate 5. The Regional Center owes its success to and is anchored by the newly expanded and refurbished Westfield Southcenter Mall. The drawing power of this retail powerhouse will continue to bring investment in retail, services and entertainment venues oriented to an expanding regional trade.

As new investment continues to flow into the Plan Area, the community envisions the emergence of an increasingly urban district that uses its progressively more valuable land with greater efficiency, and that can be comfortably explored not only by automobile but also on foot or bicycle. The area surrounding the newly refurbished super-regional mall will begin changing from the exclusively parking-lot-surrounded, auto-dominated development that has begun to fall out of favor with market trends, in favor of an increasingly walkable and amenity driven pattern reflecting contemporary consumer and investor preferences.

New development will be increasingly characterized by a pattern of walkable-scaled city blocks with key street frontages lined with visible storefronts and active sidewalks (Photo 1). Buildings will be oriented to public spaces and sidewalk areas with higher levels of amenity (Photo 6). Abundant and convenient parking will be provided, but will no longer dominate the view from the road or the sidewalk.

As the Regional Center continues to grow in response to the growth of the region, and as property values escalate, the district will continue to intensify with upper stories containing offices (Photo 2), homes (Photos 3) or hotel rooms. Infill development on the high-value property of the Mall will continue the transition from surface parking to structured parking, and will likely be increasingly characterized by mid-rise or high-rise building components built over the retail base. This process of increasing land use efficiency, development intensity, synergy and mix, will be combined with increasing walkability and accessibility befitting a true regional center. The increased intensity and vitality will continue the process of broadening the Mall's draw, expanding its "captive audience," adding customers, residents, employees and safety to the dynamic center of the region.

In the long term, the mall at the center of the parking lot will continue to be the armature for continued escalation of value, activity and investment. The public spaces that are currently the hallways of the regional shopping mall will be extended again and again, providing the bustling, high amenity pedestrian spines that connect shopping anchors and storefronts southward to the north shore of Tukwila Pond (ultimately an "amenity anchor") and eastward toward additional shops in the direction of the regional transit center (see Figure 1.2 Envisioned Long Term Growth and Change in the Regional Center). Ultimately, the current Mall's inward-focused development pattern will be reversed, its parking lots replaced entirely with the fine-grained and intensely developed patterns that characterize the most sought-after urban districts.

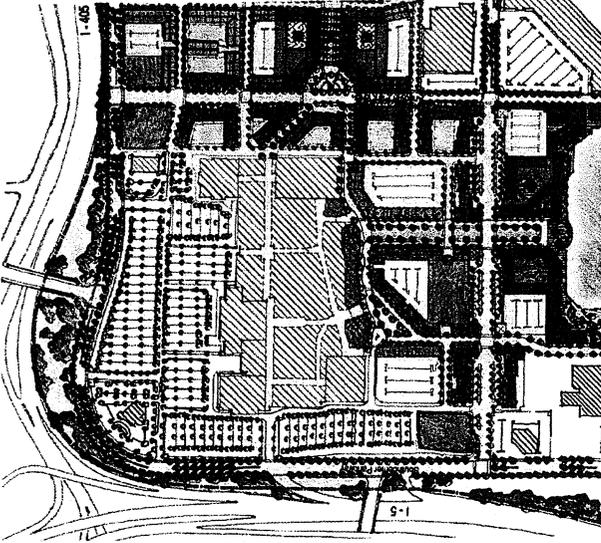
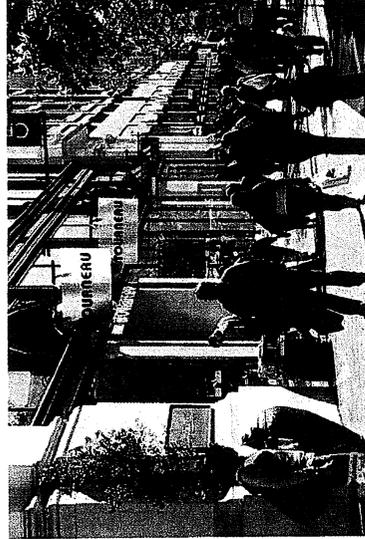
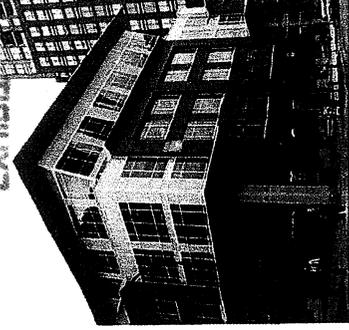


FIG. 1.2 ENVISIONED LONG TERM GROWTH AND CHANGE IN THE REGIONAL CENTER (TO BE UPDATED)



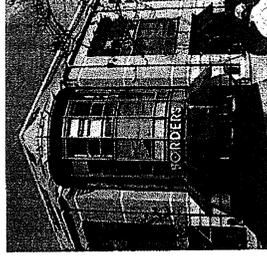
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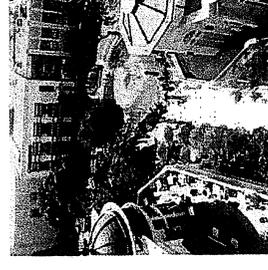
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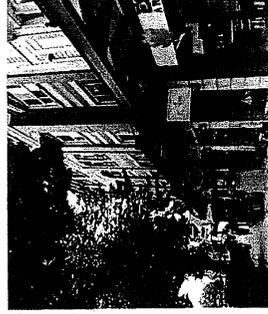
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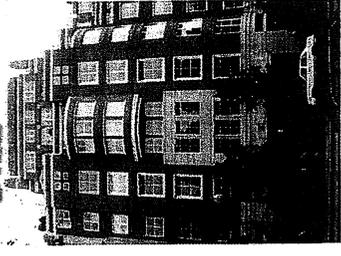
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6

PROJECT NAME

DIVISION



7

DATE

PHOTOS 1-7. ENVISIONED DEVELOPMENT TYPES IN THE REGIONAL CENTER DISTRICT

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

The Workplace District

Much of the southern portion of the Plan Area has been and will continue to be devoted to warehousing and distribution uses, many having located there for proximity to the state's largest super-regional shopping mall. The Workplace District also will continue to grow its retail niche of larger-scale goods, and especially to deepen its wide range of furniture outlets. Higher-intensity workplaces like low-rise offices will bring new workers to the area (Photo 32).

As development and intensification proceeds, policies for new investment will insure the emergence of an increasingly fine-grained network of interconnected streets. New development will provide new street connections to add capacity to accommodate internal district trips in lieu of the larger through-district arterials. As new investment proceeds, primary corridors such as Andover Park West and Andover Park East will increasingly emerge as the "front door" areas of the district, with perpendicular streets more typically accommodating service functions of parking and truck bay access.

Special Corridors

The emerging structure of distinguishable districts - the Regional Center, the Pond District, the TOD Neighborhood and the Workplace District - as the primary organizing elements of Southcenter will be complemented by the connecting arterials that span the length and width of the large urban center precinct. Two very different types of urban center-wide arterials will emerge, as follows:

TUC Boulevards

As the old pattern of congestion-prone superblocks transitions to a pattern of smaller blocks that distribute traffic along an increasing amount of street surface and alternative routes, a finer-grained hierarchy of different street-types will emerge from the previously undifferentiated network. The most heavily used and visible of Southcenter's streets will be the wide district-crossing thoroughfares. Making the most of that visibility, two of the thoroughfares are intended to become the "front doors" of the urban center, providing pedestrian amenities and enfronting development that contribute powerfully to the form and character of Southcenter. First, Strander Boulevard will continue to be the most well-traveled east-west thoroughfare and the gateway for many visitors to the Regional Center, Pond District and TOD Neighborhood. Of the several north-south arterials, Andover Park West provides the most direct connection to and through the Regional Center and the new Pond District. New development along these two "TUC Boulevards" will be oriented toward the public right-of-way, and will provide wider sidewalks, generous planting strips and decorative boulevard-scale furniture (Photo 33). High vehicular capacity and comfortable walking environments will coexist in a framework of grand-scaled public street spaces that are spatially defined by sufficiently tall buildings and properly detailed building facades.

Commercial Corridors

In order to insure that Southcenter provides opportunities for the full range of shopping industry development types, Southcenter Parkway will likely continue to service as Southcenter's commercial strip, providing sites for auto-oriented retail and services. To insure a sufficient number of opportunities to satisfy market demand for the types of auto-oriented venues that are inappropriate in the Regional Center, Pond District or TOD Neighborhood, 180th Street will also be designated as a potential location for stand-alone and auto-oriented formats, especially large-scale "big box," single tenant uses, as well as for uses requiring drive-up and drive-in facilities. As new development occurs, new improvements will provide modest new pedestrian amenities as well as beautification with indigenous landscaping.



PHOTO 32. ENVISIONED CHARACTER OF DEVELOPMENT IN THE WORKPLACE DISTRICT

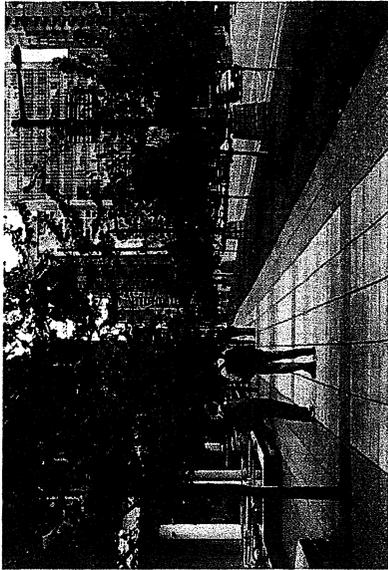


PHOTO 33. ENVISIONED DEVELOPMENT TYPE FOR THE TUC BOULEVARD



PHOTO 34. ENVISIONED DEVELOPMENT ALONG THE COMMERCIAL CORRIDORS

3) Integration of the Natural and Recreational Amenities with the Emerging Urban Center

Rather than turning its back on the natural assets of the Plan Area - as had been the pattern in the initial round of development in Southcenter, new public and private investment will "unearth" Tukwila Pond, Minkler Pond and the Green River and feature them as precious amenities to be integrated with the development of the emerging urban center. New development adjacent to the ponds and river will feature buildings oriented toward the water, and will contribute frontage improvements that add to the appeal and public accessibility of the waterfronts. The emerging "public realm" of Southcenter will increasingly be distinguished by not only new active urban streets and sidewalks, but also waterfront esplanades, pedestrian paths and bikeways. This pedestrian network will provide access to a range of recreational experiences, from urban parks and plazas to more natural environments.

Key improvements to Tukwila Pond will focus on the improving water quality and on preservation of its natural habitat for wildlife and plants, while adding infrastructure that will increase access and usability of the area for everyone.

4) Transit Integrated with Urban Center Development

As the region continues to grow, and as demand surges for increasingly compact, walkable and mixed use formats, a wide range of mobility options, especially rail transit, will become critical components for economic success, livability and sustainability in Southcenter and in the region. These trends will favor the areas of Southcenter in walking distance of the commuter rail station and bus transit center facilities, which can be expected to capture an increasingly large share of regional demand for housing and office development.

In order to realize the full potential of these facilities, existing barriers to visibility, access and convenience will be removed - for example, the Tukwila Sounder Commuter Rail/Amtrak Station will be repositioned to a more central location aligned with the emerging pedestrian spine of the Baker Boulevard corridor. Development around and in walking distance of transit stations will provide much enhanced connectivity to and from transit facilities as they contribute to improvements that incrementally add to the network of walkable, safe, and complete street environments - and in turn, the new transit oriented development will promote system ridership.

Transit will serve as a backbone for new development throughout Southcenter, and make the most of its potential to insulate surrounding development. The most visible, usable example of this will be a new "transit spine" connecting Southcenter's transit centers. The bus transit center located at the edge of the mall property will be seamlessly connected to the new station along a street designed for walking. All new roads in the northern Southcenter area will connect to this spine, making the stations the focal points of the area's circulation network. These two transit anchors will also be linked by bus routes and ultimately engaging "people-movers" will decrease the need for a private vehicle in the district.

The station itself will be designed to be attractive, accessible and interconnected to the workings of the Southcenter as a whole. The station platform will be relocated further south to a location at the terminus of the new "transit spine". The Tukwila Sounder Transit Center will ultimately include a new plaza, with adjacent multi-modal facilities such as a bus terminal, "kiss-ride" drop off, and a park-and-ride lot or garage. In addition to the Sounder station facility, the overall network of transit in Southcenter will be improved. Transit improvements will include improved bus service, better links between bus and train service, and bike routes along Southcenter's internal streets.

Finally, the bus center will be improved to provide a transit interchange that is well-served by and integrated with its surroundings. New pedestrian paths and public sidewalks will lead pedestrians from surrounding areas to the center, and the most-heavily used route, from the center to the Mall, will be improved with a covered walkway leading directly to the Mall entrance.

1.4 REINVESTMENT STRATEGY

To orchestrate growth and change in the Plan Area in keeping with the community's vision for the emergent Southcenter, the City leadership intends to promote and guide new investment and change by employing municipal policies and resources strategically. Keeping in mind that strategy must always remain sufficiently nimble to respond to unexpected opportunities and to make best use of resources as they become available, the strategic priorities that the City leadership intends to pursue are the following:

- 1) **Promote investment in the full range of retail and entertainment investment in Southcenter: identify appropriate, clear and functional locations for pedestrian-oriented destination retail, auto-oriented retail, and for neighborhood and convenience retail and services. Create a framework that accommodates the widest possible range of investment while avoiding the potential loss of value from inappropriate juxtapositions of different shopping development types.**
- 2) **Build on the presence of major retail anchor uses to encourage the augmentation of existing shopping assets with the type of urban amenity-driven, pedestrian-oriented shopping increasingly favored by consumers and investors.**
- 3) **Promote the relocation of the commuter rail station to a more centrally located, and more visible and accessible location along the railroad right-of-way; leverage the relocated and refurbished commuter rail station to stimulate investor interest in transit-oriented housing and office development in Southcenter.**
- 4) **Use land use and development policies to incubate the development of a model transit-oriented neighborhood within walking distance of the commuter rail station.**

5) **Promote the consolidation of the railroad rights-of-way in the northeastern quadrant of Southcenter to 1) remove barriers between the district and the train station, and 2) to free up large assembled properties to kick off the redevelopment of the station area neighborhood.**

6) **Continue to enhance connections between the Mall, the commuter rail station and the refurbished Tukwila Pond in order to reap synergies of destination retail, recreation amenities, increasingly compact housing and office development, convenience and mobility.**

7) **Concentrate entitlements for the most intensively developed projects in the northern Southcenter area to make the most of high development potential of the area.**

8) **Coordinate private and public contributions to the block and street system such that each new segment adds to the connectivity and number of alternative routes through Southcenter.**

9) **Use a combination of development regulations and capital improvements to unearth the natural features of Southcenter - Tukwila Pond, the Green River and Minkler Pond - as public amenities.**

10) **Streamline the approval process for investors by providing them with clear and detailed information regarding the community's requirements for the terms of new development to stimulate active private investments.**

3

18.28.000 ORIENTATION

This section contains the Development Code that will be used to evaluate development projects or improvement plans proposed on properties within the Southcenter Plan Area. The Code contains regulations governing Use, Height, Building Placement, Public & Private Frontage, Parking, Streets, Blocks, Open Space, Landscaping, and Architecture.

18.28.001 APPLICABILITY

The provisions of this chapter shall be used to evaluate new construction, expansions, exterior alterations, changes in use, tenant improvements, land division, and site modifications proposed for properties within the Tukwila Urban Center Plan Area Map described in Section 1.2 Plan Area.

The provisions of this chapter shall modify the regulations and other provisions in TMC Title 18 Zoning; provided that the regulations and provisions of Tukwila Municipal Code (TMC) shall apply when not specifically covered by this chapter; and, further, provided that where Title 18 and the goals of the Southcenter Plan and this chapter are found to be in conflict, the provisions of this chapter shall apply.

18.28.002 CLASSIFICATION OF PROJECT PERMIT APPLICATIONS

Any land use permit or approval issued by the City is a Type 1 permit decision, unless specifically categorized as a Type 2, 3, 4, or 5 decision by TMC 18.104. Architectural Design Review requires a Type 2 or 4 decision.

18.28.003 THRESHOLDS FOR CONFORMANCE WITH THE DEVELOPMENT CODE

As part of the permit decision procedure, project permit applications shall be reviewed for conformity with the standards and guidelines contained in this chapter, as set forth below and summarized in Figure 18.28.003 Conformance with the Development Code (see Section 18.28.006 for definitions of standards, regulations, and guidelines):

1) New Construction

a) Applicable Standards & Regulations

- i) All new construction shall comply with all of the standards and regulations of this chapter.

2) Expansions of Existing Structures

a) Applicable Standards & Regulations

- i) Expansions of existing structures (new floor area) shall comply with all of the standards and regulations of this chapter.
- ii) Compliance with new street regulations and maximum block size is required when the traffic impacts generated by new development triggers the need for mitigation, as determined by the DCD Director.

3) Exterior Alterations (does not include additions)

a) Applicable Standards & Regulations

- i) Exterior alterations to a structure meeting the thresholds for "Typical Projects" and "Major Retail Centers," defined in Section 18.28.003.3.b below, shall comply with the following standards and regulations and strive to meet the intent of the associated guidelines:

(1) Scale Standards and Regulations

- Maximum Building Height
- Maximum Tower Bulk

(2) Frontage and Building Placement Regulations

- Building Orientation
- Private frontage types
- Side yard setbacks
- Rear yard setbacks
- Alley setbacks

(3) Landscaping Regulations

(4) Site Component Regulations

(5) Architectural Regulations (see section 18.28.004 Architectural Design Review)

- Building Massing
- Architectural Elements

b) Exterior Alteration Thresholds.

- i) Typical Projects. Compliance with the above regulations is required when the combined costs stated on all submitted City permit applications for exterior alterations to a structure within any rolling 2 year period equals or exceeds 5% of the structure's Assessed Value (unless the work is covered under the exception section below, or the work occurs within a "major retail center"). This threshold shall also be applied to exterior alterations to a stand-alone pad development in a major retail center.

- ii) Major Retail Centers. Compliance with the above regulations is required when the combined costs stated on all submitted City permit applications for exterior alterations to an individual tenant space in major retail centers within any rolling 2 year period equals or exceeds \$100,000 (unless the work is covered under the exception section below). Major retail centers are defined as a collection of retail stores, restaurants, services, and parking areas constructed and maintained as a unit by a management firm; with a total building square footage greater than 50,000 square feet and located on a parcel greater than 5 acres in size. Lots created as part of a binding site plan shall be considered as one parcel. Examples of a major retail center include Southcenter Plaza, Westfield Mall, Parkway Supercenter, and Southcenter Square.

- (1) Exterior alterations of individual tenant spaces that meet the exterior alteration threshold shall trigger a review of the following landscaping requirements for the site: public and private frontage, setbacks, parking lots, and screening. If the associated premise does not comply with the landscape requirements, the DCD Director will determine the degree of compliance, including limiting required improvements to a smaller area of the premise which is more equivalent to the percentage of total building being altered.

Required improvements may be made as part of the alteration that triggers the required improvements. The cost of the landscaping standards that shall be met is limited to 10% of the value of the proposed alterations. It is the responsibility of the applicant to document to the DCD Director the value of the required improvements. Additional costs may be required to comply with other applicable requirements associated with the proposal.

c) Exceptions to Exterior Alterations Value Calculations

- i) The following ordinary maintenance shall not be included in the value calculations for the exterior alteration to any structure: Sign installation, painting, roof repair and replacement, plumbing, wiring, mechanical equipment repair/replacement, and weatherization.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

4) Substantial Alteration

- a) Applicable Standards & Regulations
 - i) Substantial alteration of an existing structure shall require compliance with all of the standards and regulations of this chapter.
- b) Substantial Alteration Threshold
 - i) Substantial alteration occurs when the combined costs stated on all submitted City permit applications for any repair, reconstruction, rehabilitation, demolition, tenant improvements or other improvements to a structure within any rolling 2 year period exceeds 50% of the replacement value of the structure. Replacement values before the start of construction activity or before damage had occurred (if the structure was damaged and is being restored) shall be used.
 - ii) Replacement value shall be evaluated using the current Building Evaluation Data charts published annually by the International Conference of Building Officials (ICBO) on file with the Building Official. Any valuations not specified in that publication will be determined by the Building Official.

5) Change in Use / Intensification

- a) Applicable Standards & Regulations
 - i) Any application involving a change in use to an existing structure or premises, as determined by the DCD Director, shall comply with the following regulations:
 - (1) Use Standards and Regulations
 - Use
 - (2) Scale Regulations
 - Maximum Block Size, if applicable
 - (3) Frontage and Building Placement Regulations
 - Public Frontage Improvements
 - Street Regulations
 - New street requirements, if applicable
 - (4) Open Space Regulations, if applicable
 - (5) Landscaping Regulations
 - (6) Site Component Regulations
 - (7) Parking Standards and Regulations
 - Provision of Parking
 - General parking requirements and guidelines
- b) Change in Use/Intensification Threshold

- i) As redevelopment of the urban center occurs, the existing use of land or structure may change to a different, more intensive use, necessitating additional improvements to serve the level of development not accommodated in the original site design or layout.

- ii) The DCD Director shall consider the following to determine if a change of use is proposed:

- (1) The difference in trips generated between the proposed use and the current or previous use, or
- (2) The difference in required parking stalls between the proposed use and the current or previous use, or
- (3) The likelihood that the proposed use shall increase pedestrian activity and the need for pedestrian-oriented improvements.
- (4) A structure is demolished to provide parking.

6) Tenant Improvements

- a) Applicable Standards & Regulations
 - i) Tenant improvements, when total cost is less than 50% of the replacement value of the structure, are exempt from the standards and regulations contained in this chapter.
 - ii) Tenant improvements are defined as changes made to the interior of a commercial or industrial property by its owner to accommodate the needs of a tenant, such as floor and wall coverings, ceilings, partitions, air conditioning, fire protection, and security.

7) Land Division

- a) Applicable Standards & Regulations
 - i) Any short plats and binding site plans shall comply with the following standards and regulations:
 - (1) Scale Regulations
 - Maximum Block Size, if applicable
 - (2) Frontage and Building Placement Regulations
 - Public Frontage improvements
 - Street Regulations
 - New streets requirements, if applicable
 - (3) Site Component Regulations
- b) Applicable Standards & Regulations

- i) Any project proposing only landscaping alterations or paving of additional area shall comply with the following regulations:

- (1) Landscaping Regulations
- (2) Site Component Regulations

9) Nonconforming Uses and Development

- a) Applicable Standards & Regulations
 - i) Nonconforming uses and development may continue as set forth in TMC Chapter 18.70, unless specifically limited by other regulations of this chapter.

10) Shoreline Master Program

- a) Applicable Standards & Regulations
 - i) All actions on parcels or parts of parcels under Shoreline Master Program jurisdiction shall be consistent with the goals, policies and actions as laid out in the Shoreline Master Program.
 - ii) Development in these areas shall be regulated by the Tukwila Urban Center Regulations as well as by the Shoreline Master Program provisions as set forth in Chapter 18.44 of the Tukwila Municipal Code.
 - iii) Where there is a conflict between these subarea regulations and the Shoreline regulations, the more stringent regulations shall apply.

FIG. 18.28.03 CONFORMANCE WITH DEVELOPMENT CODE

5

5

5

Standards and Regulations that will be used to evaluate the project	Use			Scale			Frontage & Building Placement										Street	Open Space	Land Use	Site	Parking			Architecture		
	Use	Minimum Building Height	Maximum Building Height	Maximum Tower Bulk	Maximum Block Size **	Building Orientation	Public Frontage Improvements	Private Frontage Types	Front Yard Setback	Side Yard Setback	Rear Yard Setback	Alley Setback	Frontage Coverage	Build to Corner	Special Corner Location	Building Length	New Street Regulations **	Open Space Regulations ***	Landscaping Regulations	Site Component Regulations	Provision of Parking	Parking Types & Location	General Parking Requirements & Guidelines	Building Massing Regulations	Architectural Elements Regulations	
Type of Development																										
NEW CONSTRUCTION	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EXPANSION OF EXISTING STRUCTURES - applies only to new floor area																										
EXTERIOR ALTERATIONS - Typical Projects. Any exterior alteration (not additions) to a structure when the combined costs stated on all submitted City permit applications within any rolling 2 year period, equals or exceeds 5% of the structure's assessed value (unless the work is covered under the exception section of the chapter ** or the work occurs within a "major retail center"). This threshold shall also apply to exterior alterations to a stand-alone pad development in a major retail center.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EXTERIOR ALTERATIONS - Major Retail Centers. Any exterior alteration of an individual tenant space in major retail centers when the combined costs stated on all submitted City permit applications within any rolling 2 year period equals or exceeds \$100,000 (unless the work is covered under the exception section of the chapter *)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SUBSTANTIAL ALTERATIONS - Any repair, reconstruction, rehabilitation, or other improvements to a structure (unless the work is covered under the exception section of the chapter ***) when the combined costs stated on all submitted City permit applications within any rolling 2 year period exceeds 50% of the replacement value of the building or structure either before the start of construction or, if the structure has been damaged and is being restored, before the damage occurred, shall require compliance with all of the regulations of this chapter.																										
TENANT IMPROVEMENTS	X				X		X										X	X	X	X	X	X				
CHANGE IN USE - in Building or premises																										
LAND DIVISION - Short Plat or Blinding Site Plan					X		X										X		X	X						
SITE MODIFICATIONS - Any changes to landscaping or paving additional area.																			X	X						

* Exceptions: Construction work that shall not be included within the value calculations shall include: *Installation of signs, roof repair and replacement, plumbing, wiring, mechanical equipment repair replacement, and weatherization*
 ** Compliance with requirements for new, pre-located street regulations or maximum block size is required when the traffic impacts generated by new development triggers the need for mitigation, as determined by the DCD Director.
 *** Compliance with provision of open space is required when there is a significant intensification of a use or premises from new development, redevelopment, or a change in use, as determined by the DCD Director.

LEGEND

X: Conformity with the indicated standards and regulations may be required depending on the proposed development.

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

18.28.010 DEVELOPMENT STANDARDS

18.28.011 USE STANDARDS

1) Use Zones Established

- i) 7 Use Zones are hereby established in the specific locations and with the specific names indicated in the Figure 18.28.011 Use Map.
- ii) The uses permitted for all development shall be governed by the standards and regulations for the applicable Use Zone.
- iii) Use Standards Chart



2) Use Standards Chart lists:

- i) The Use Standards Chart lists:
 - (1) All Use Zones - these appear in the top row of the chart.
 - (2) The Use Categories and Land Uses in the order that they appear in Section 18.28.020 - these appear in the left-most column of the chart.
 - (3) The Use Standards that apply to each Use Zone - these can be reviewed by cross referencing a Regulation with a Use Zone.

3) Use Regulations & Guidelines

- i) Use regulations and guidelines can be found in Section 18.28.020 Use Regulations

LEGEND	
	Regional Center
	Pond District
	Corridor Commercial
	Workplace
	TOD - Urban
	TOD - River
	TOD - Station
	Other
	Public Recreation Overlay (see IMC 18.42)
	Transit Station Site
	Parcel Line
	Plan Area Boundary

FIG. 18.28.011 USE MAP

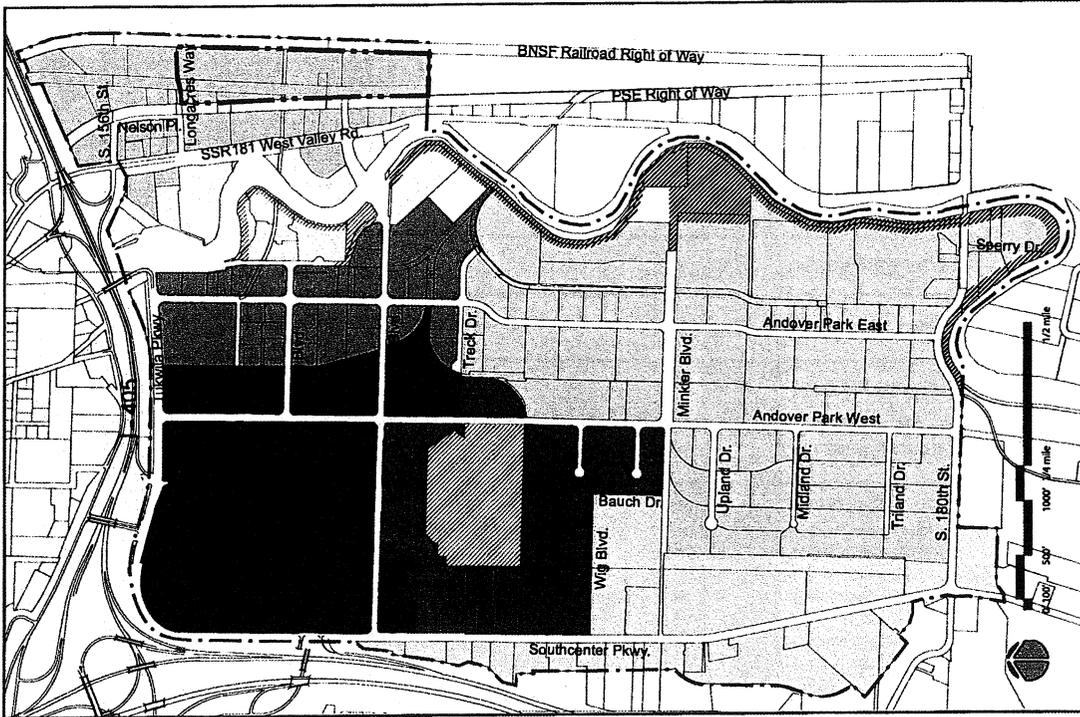


Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

USE STANDARDS CHART

Use Zone	Regional Center		Pond District		Corridor Commercial		Workplace		TOD Urban		TOD River		TOD Station	
	P (C2)	P (C2)	P (C2)	P (C2)	P (C1)	P (C1)	P (C1)	P (C1)	P (C1)	P (L1 & L5)	P (L1 & L5)	P (L1)	P (L1)	P (L1)
RETAIL														
Specialty Goods & Foods														
Pharmacy / Grocery Anchors (over 15k sf)	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P	P	P
Department & Variety Store Anchors	P	P	P	P	P (C1)	P (C1)	P (C1)	P (C1)	P (C1)	P (L1)	P (L1)	P	P	P
Small Scale Specialty Goods & Foods (not anchor)	P	P	P	P	P (C1)	P (C1)	P (C1)	P (C1)	P (C1)	P (L1 & L5)	P (L1 & L5)	P (L2)	P (L2)	P (L2)
Large Scale Specialty Goods & Bulk Foods	P	P	P	P	P	P	P	P (S2)	P					
Eating & Drinking Establishments														
Bars, cocktail lounges, and nightclubs	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Restaurants	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Entertainment & Recreation														
Theaters, except "adult entertainment"	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Recreation facilities (commercial/leisure)	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Recreation facilities (commercial/leisure)	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Business & Personal Services														
Business services	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Banks, financial, insurance, and real estate services	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Personal services	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Athletic or health clubs	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Repair shops (small scale goods: bicycle, appliances, computer, watch, shoe)	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Veterinary clinic (incl. associated temporary indoor boarding), animal grooming, and doggy daycare	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Commercial Goods														
Large retail Commercial Goods	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)
Vehicle rental or sales office	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)	P (C5, C6)
Commercial Services														
Animal kennels and shelters	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Funeral homes, morticians, and crematoriums	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Repair Shops (commercial/ automotive)	P	P	P	P	P (C5)	P (C5)	P (C5)	P (C5)	P (C5)	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)
Gas stations, including car wash	P	P	P	P	P	P	P	P	P	P (L1)	P (L1)	P (L1)	P (L1)	P (L1)

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
OFFICE							
Professional	P-U	P	P	P	P	P	P
Medical and dental (outpatient only)	P-U	P	P	P	P	P	P
Research	P-U	P	P	P	P	P	P
Governmental services	P-U	P	P	P	P	P	P

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
LODGING (hotel, extended stays, inns, B&Bs)							
Hotel, extended stays, inns, bed and breakfasts	P-U	P	P	P	P	P	P

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
CIVIC & INSTITUTIONAL							
Cultural facilities, including libraries, performing art centers, museums, and art galleries	P	P	P	P	P	P	P
Education & Instructional Facilities, public and private, including colleges and universities	P-U	P	P	P	P	P	P
Conferences/conventions facilities	P-U	P	P	P	P	P	P
Ballrooms	P-U	P	P	P	P	P	P
Fire & Police Stations	P-U	P	P	P	P	P	P
Post Office	P-U	P	P	P	P	P	P
Daycare center	P-U	P	P	P	P	P	P
Daycare center, play area, playgrounds, and public community centers.	P	P	P	P	P	P	P

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
RESIDENTIAL							
Multi-family	P-U	P	P	P	P	P	P
Attached Single Family	P-U	P	P	P	P	P	P
12 patients (except those meeting the definition of correctional institution)							
Residential care facilities for not more than 12 patients (except those meeting the definition of correctional institution)							
Flower Occupation							
Dormitory							
TRANSPORTATION, COMMUNICATION, AND INFRASTRUCTURE							
Public transit (bus) facilities & stations	P (C4)	P (C4)	P (C4)	P (C4)	P (C4)	P (C4)	P (C4)
Commercial parking	A	A	A	A	A	A	A
Parking areas							
Essential public facilities, except those specifically listed as a permitted, conditionally permitted or unclassified use in any of the other zones	UUP	UUP	UUP	UUP	UUP	UUP	UUP
High capacity transit facilities, and public transit (bus) terminals and centers	UUP	UUP	UUP	UUP	UUP	UUP	UUP
Urban facilities	U	U	U	U	U	U	U
Rail facilities, microwaves, or observation stations and towers	C	C	C	C	C	C	C
Internet data/telecom centers, including telephone exchanges							
Wireless communication facilities							

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
INDUSTRY, MANUFACTURING AND WAREHOUSING							
Industrial commercial services							
Light industrial: manufacturing, processing							
Warehouse storage and wholesale distribution facilities							
Self-storage facilities							
Storage (outdoor) of materials allowed to be manufactured or handled within facilities conforming to uses under this chapter; and screened pursuant to Chapter 18.52, as necessary to a permitted use							
Crane containers (subject to TMC 18.50.060)							

Use Zone	Regional Center	Pond District	Corridor Commercial	Workplace	TOD Urban	TOD River	TOD Station
SPECIAL USE CONFIGURATION							
Drive-in or Drive-thru facilities or services							
Neighborhood Center							
Corner Store							

LEGEND
 P: permitted
 C: Conditional
 A: Ancillary to other permitted uses
 UUP: Permitted with unclassified use permit
 -U: Upper floors only
 ---: not permitted

Location / orientation
 L1: Only in a Neighborhood Center (see section 18.28.022 for definitions and regulations for these use configurations)
 L2: Only in a Neighborhood Center or Corner Store (see section 18.28.022 for definitions and regulations for these use configurations)
 L3: Building Orientation to West Valley Highway required (see section 18.28.041)
 L4: Building Orientation to the east side of West Valley Highway required (see section 18.28.041)
 L5: Building Orientation to the Green River required (see section 18.28.041)

Size
 S1: 3,500 sf max per use
 S2: over 100,000 sf per use

Conditions
 C1: with residential
 C2: w/ over 100 DU of residential
 C3: only 1 in the district
 C4: day use only, and must be located within a structure having substantial ground floor retail or commercial activities.
 C5: excluding vehicle storage or maintenance lot or commercial activities
 C6: excluding vehicles requiring a commercial driver's license
 C7: uses must be generally contained within buildings
 C8: activities do not generate external emissions such as smoke, odor, noise, vibrations or other nuisances outside the building.
 C9: Enclosed w/in a building

Note
 Other uses not specifically listed in this Title are permitted should the Director determine them to be:
 a) similar in nature to and compatible with other uses permitted outright within a District; and
 b) consistent with the stated purpose of a district, and
 c) consistent with the policies of the Tukwila Urban Center Plan

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

SCALE STANDARDS CHART

Scale Zone	Urban Core Standards	General Urban Standards	Sub-Urban Standards
REGULATIONS			
18.28.031. Building Height	2 floors & 25 ft (A1) min 12 floors & 142 ft max	2 floors & 25 ft (A2) min 8 floors & 98 ft max	1 floor & 20 ft min 3 floors & 43 ft max
18.28.032. Special Height Limits	4 floors & 54 ft max n/a n/a	4 floors & 54 ft max 5 floors & 65 ft max 3 floors & 43 ft max	n/a n/a n/a
TUC Blvd Edge (within 65 feet)	n/a		
Urban Pond Edge (within 100 feet)	n/a		
Natural Pond Edge (within 100 feet)			
Urban River Edge			
1) within 125 feet of OHWM	n/a	15 ft max	n/a
2) between 125 and 200 feet of OHWM	n/a	See Shoreline Master Program Section 9.3 for height standards	n/a
Urban Core (within 300 feet of either Tukwila Parkway or Southcenter Parkway)	18 floors & 214 ft max (A3)	n/a	n/a
18.28.033. Maximum Tower Bulk			
Maximum Diagonal	300 ft max	250 ft max	n/a
18.28.034. Maximum Block Size			
1) Provision of New Street	2,000 ft max	1,500 ft max	2,500 ft max
18.28.036. Permitted Corridor Types for New Streets			
1) Urban Corridor	permitted	-	-
2) Primary City Corridor	permitted	permitted	-
3) Secondary City Corridor	permitted	permitted	-
4) Sub-Urban Corridor	-	-	permitted

Legend

- (A1) 1 floor & 25 ft (only for anchor)
 - (A2) 1 floor & 25 ft (only for pharmacy / grocery store anchor)
 - (A3) Floors above 12 must be residential uses or housing, or, residential uses or housing equal in area to the total non-residential square footage on floors 13 through 18 must be constructed in the Urban Core or General Urban zones. If affordable or senior housing is constructed, the required area may be reduced by up to 1/3 by the DCD Director as a special permission decision.
-  OHWM
 ordinary high water mark

2) Scale Standards Chart

- i) The Scale Standards Chart lists:
 - (1) All Scale Zones - these appear in the top row of the chart.
 - (2) The Primary Scale Regulations in the order that they appear in Section 18.28.030 - these appear in the left-most column of the chart.
 - (3) The Scale Standards that apply to each Use Zone - these can be reviewed by cross referencing a Regulation with a Scale Zone.

3) Scale Regulations & Guidelines

- i) Scale regulations and guidelines can be found in Section 18.28.030 Scale Regulations

18.28.013 FORM STANDARDS

1) Corridor Types Established

- i) Eight Corridor Types are hereby established in the specific locations and with the specific names indicated in the Figure 18.28.013 Form Map.
- ii) The form of all development along a street, primary open space, or water body right-of-way shall be governed by the standards and regulations for the applicable Corridor Type.

2) Corridor Type Definition

- i) A Corridor consists of (see Figure 18.28.013.2 Corridor Definition of Terms):
 - (1) All portions of the public right-of-way of a street, open space, or water body (the thoroughfare and public frontage).
 - (2) Portions of a property between the back-of-sidewalk and the primary building façade along the street or open space.
 - (3) Portions of all primary building façades up to the top of the first or second floor, including building entrances, located along and oriented toward the street or open space.

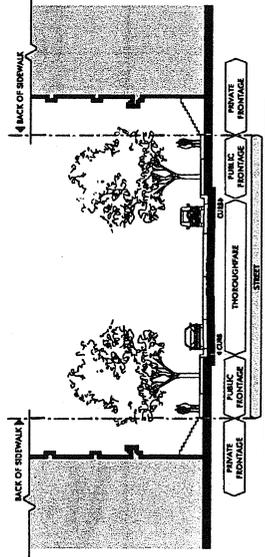
3) Applicability - Existing & New Corridor Types

- i) All existing & new streets, primary open spaces, or water body rights-of-way shall be designated as a Corridor Type as follows:
 - (1) Existing streets, primary open spaces, or water body rights-of-way shall be designated as the Corridor Type indicated on the Figure 18.28.013 Form Map.
 - (2) New streets built to satisfy Pre-located Street requirements (Section 18.28.051) shall be designated as the Corridor Type indicated on the Figure 18.28.013 Form Map.
 - (3) New streets built to satisfy Maximum Block Size requirements (Section 18.28.034) shall be designated by the developer as one of the Corridor Types permitted by Scale Zone (Section 18.28.012).
 - (4) New streets or open spaces that do not fall into one of the preceding categories shall be designated by the developer as one of the Corridor Types permitted by Scale Zone (Section 18.28.012).

4) Form Standards Chart

- i) The Form Standards Chart lists:
 - (1) All Corridor Types - these appear in the top row of the chart.
 - (2) The Primary Form Regulations in the order that they appear in the Sections 18.28.040 through 18.28.100 - these appear in the left-most column of the chart.
 - (3) The Form Standards that apply to each Corridor Type - these can be reviewed by cross referencing a Regulation with a Corridor Type.

FIG. 18.28.013.2 CORRIDOR DEFINITION OF TERMS



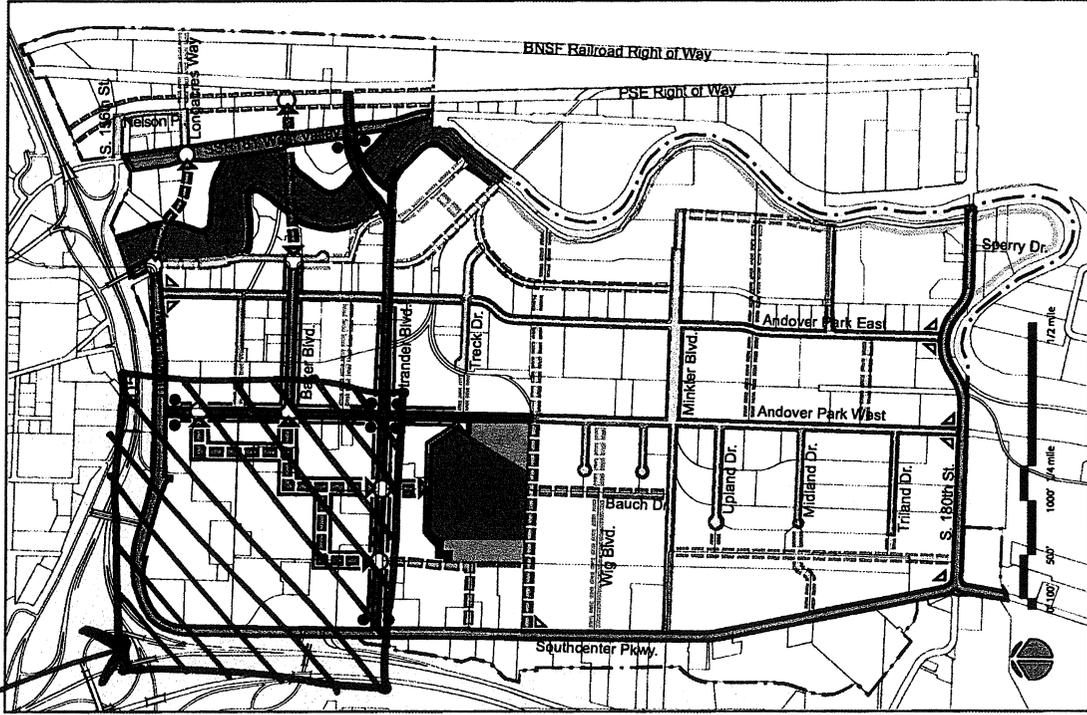
The Form Standards Chart lists:

- (1) All Corridor Types - these appear in the top row of the chart.
- (2) The Primary Form Regulations in the order that they appear in the Sections 18.28.040 through 18.28.100 - these appear in the left-most column of the chart.
- (3) The Form Standards that apply to each Corridor Type - these can be reviewed by cross referencing a Regulation with a Corridor Type.

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

① See attached

FIG. 18.28.013 FORM MAP



LEGEND

Corridor Types for Existing Streets

- Urban Corridor
- Primary City Corridor
- Secondary City Corridor
- TUC Boulevard Corridor
- Urban Waterfront Corridor
- Natural River Corridor
- Commercial Corridor
- Sub-Urban Corridor

Corridor Types for Pre-located New Streets (see Section 18.28.051)

- Urban Corridor
- Primary City Corridor
- Secondary City Corridor
- Commercial Corridor
- Sub-Urban Corridor

Corridor Types for Required New Street Connections (see Section 18.28.051.)

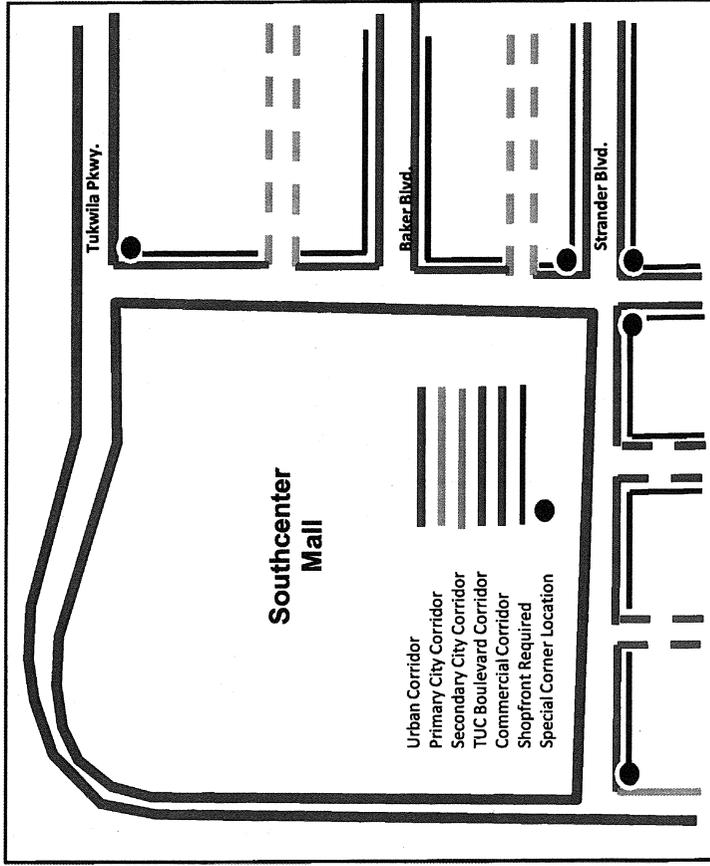
- Urban Corridor

Other

- Shopfront Required (Section 18.28.049)
- Special Corner Location (Section 18.28.0410)
- Connection Point
- Parcel Line
- Plan Area Boundary

②

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)



Page 22 Comment—Proposed Changes to portion of TUC Form Map

FORM STANDARDS CHART

(3)

Corridor Type	Urban Corridor Standards	Primary City Corridor Standards	Secondary City Corridor Standards	TUC Boulevard Corridor Standards	Urban Waterfront Corridor Standards	Natural River Corridor Standards	Commercial Corridor Standards	Sub-Urban Corridor Standards
REGULATIONS								
18.28.040 FRONTAGE & BUILDING PLACEMENT								
18.28.041 Building Orientation to Streets/Open Spaces	required	required	required	required	required	not required	not required	not required
18.28.042 Public Frontages/Improvements	required	required	required	required	required	not required	required	required
18.28.043 Private Frontage Types	required	required	required	required	required (L1)	required	required	required
a) Shop/Front	permitted, required (L1)	permitted	permitted	permitted, required (L1)	permitted, required (L1)	permitted	permitted	permitted
b) Corner Entry	permitted	permitted	permitted	permitted, required (L5)	permitted	permitted	permitted	permitted
c) Arcade	permitted (C5)	permitted	permitted	permitted (C2)	permitted except (L1)	permitted	permitted	permitted
d) Grand Porch	permitted (C2)	permitted	permitted	permitted (C2)	permitted except (L1)	permitted	permitted (C2)	permitted
e) Grand Entry	permitted	permitted	permitted	permitted (C1)	permitted except (L1)	permitted	permitted	permitted
f) Shop Entry	permitted (C1)	permitted	permitted	permitted	permitted (C1)	permitted	permitted	permitted
g) Porch	permitted (L2)	permitted	permitted	permitted	permitted	permitted	permitted	permitted
h) Front Door	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
i) Sign Treatments	flush edge required	required	required	required	required	required	required	required
18.28.044 Front Yard Setback	0 ft min / 10 ft max, 10 ft min, 20 ft max (L2)	0 ft min, 10 ft max	5 ft min, 15 ft max	5 ft min, 15 ft max, 0 ft min / 0 ft max (L1)	5 ft min, 15 ft max	10 ft min	15 ft min	15 ft min
18.28.045 Side Yard Setback	15 ft min	15 ft min	15 ft min	15 ft min	15 ft min	15 ft min	15 ft min	15 ft min
18.28.046 Rear Yard Setback	5 ft min	5 ft min	5 ft min	5 ft min	5 ft min	10 ft min	10 ft min	10 ft min
18.28.047 Alley Setback	10 ft min	10 ft min	10 ft min	10 ft min	10 ft min	10 ft min	10 ft min	10 ft min
18.28.048 Minimum setback	5 ft min	5 ft min	5 ft min	5 ft min	5 ft min	10 ft min	10 ft min	10 ft min
18.28.049 Frontage Coverage	50% min	75% min	50% min	50% min	50% min	50% min	50% min, 50% (L4)	50% min
18.28.050 Minimum percentage covered	required	required	required	required	required	not required	required (L6)	required (L6)
18.28.051 Special Corner Location	required	required	required	required	required	not required	required (L6)	required (L6)
18.28.052 Building Length	n/a	n/a	n/a	n/a	n/a	n/a	required (L5)	n/a
18.28.053 Building Length	120 ft max, 240 ft max (L1)	120 ft max	300 ft max	120 ft max, 180 ft max (L1)	n/a	n/a	required (L5)	n/a
18.28.050 STREET REGULATIONS								
18.28.051 Provision of New Streets								
18.28.052 New Street Types	required (L1)	permitted	permitted	n/a	n/a	n/a	n/a	n/a
18.28.053 Street	permitted	permitted	permitted	n/a	n/a	n/a	n/a	n/a
18.28.054 Street	permitted (L3)	permitted	permitted	n/a	n/a	n/a	n/a	n/a
18.28.055 Street	permitted (C4)	permitted (C4)	permitted (C4)	n/a	n/a	n/a	n/a	n/a
18.28.056 Pedestrian Way	permitted	permitted (C4)	permitted (C4)	n/a	n/a	n/a	n/a	n/a
18.28.060 OPEN SPACE REGULATIONS								
18.28.061 Provision of Open Space								
18.28.070 LANDSCAPING REGULATIONS								
18.28.071 Setback Areas								
18.28.072 Public Frontage Areas								
18.28.090 PARKING REGULATIONS								
18.28.091 Provision of Parking								
18.28.092 Parking Types & Location	permitted	permitted	permitted	permitted	permitted	permitted	permitted, -- (L4)	permitted
18.28.093 Surface Lot - Front	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.094 Surface Lot - Side	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.095 Surface Lot - Rear	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.096 Structure - Expansed	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.097 Structure - Wrapped, Ground Level	permitted except (L2)	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.098 Structure - Wrapped, All Levels	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.099 Structure - Utility Submerged Platform	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.100 Structure - Utility Elevated	permitted	permitted	permitted	permitted	permitted	permitted	permitted	permitted
18.28.100 ARCHITECTURAL DESIGN REGULATIONS								
18.28.101 Building Height/Massing								
18.28.102 Building Height/Massing	required	required	required	required	required	not required	required	required
18.28.103 Building Height/Massing	required	required	required	required	required	not required	required	required
18.28.104 Building Height/Massing	80 ft maximum	80 ft maximum	150 ft maximum	60 ft maximum	80 ft maximum	100 ft maximum	100 ft maximum	140 ft maximum

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

5) Form Regulations & Guidelines

Form regulations and guidelines can be found in Sections 18.28.040 Frontage & Placement Regulations, 18.28.050 Street Regulations, 18.28.060 Open Space Regulations, 18.28.070 Landscaping Regulations, 18.28.090 Parking Regulations, and 18.28.100 Architecture Regulations.

Legend
 Permitted: these elements are allowed by right unless otherwise specified.
 ---: not permitted
 required: these are required elements of all new development as indicated.
 n/a: not applicable as indicated
 not required: these elements are not required as indicated.

Location
 L1: Along
 L2: Along Tukwila Pond
 L3: Special configurations are required along the southern edge of Tukwila Pond and the PS&E right-of-way
 L4: Along West Valley Highway
 L5: - as indicated on the Form Map
 L6: - as indicated on the Form Map

Conditions
 C1: For Upper Floor Uses
 C2: Civic Only
 C3: only with shopfront
 C4: only for Green River access (18.28.035)
 C5: shall be combined with shopfront along _____

18.28.020 USE REGULATIONS

For the purposes of this Plan, all permitted, conditional, accessory, and unclassified uses have been grouped into Use Categories. Descriptions for each category are established in the text below. All permitted uses for a single Use Zone are allowed either alone or in combination with any other permitted uses within a parcel. Other uses not specifically listed in this Title are permitted should the DCD Director determine them to be similar in nature to and compatible with other uses permitted outright within a Use Zone, consistent with the stated purpose of a Use Zone, and consistent with the policies of the Southcenter Plan.

18.28.021 USE CATEGORY DEFINITIONS

1) Retail

Description: Shopping including specialty goods/foods, eating & drinking establishments, entertainment & recreation, services, and commercial goods.

i) Definitions

(1) Anchor: A large store that generates significant pedestrian traffic and that increases the traffic of shoppers at or near its location. Consumers, attracted by the anchor store, are likely to visit the location, and thus nearby stores' sales and profits are increased by the presence of the anchor.

(2) Cluster: A cluster is made up of two or more abutting retail establishments.

(3) Small Scale Goods: Goods which can be carried around in shopping bags while shopping on foot.

(4) Large Scale Goods: Goods which are too large to carry around while shopping on foot and must be placed in a car or shipped to the customer.

ii) Special Conditions

(1) Minimum interior height for ground level retail of all types is 15 feet from floor to dropped ceiling, and 18 feet from floor to floor plate. Use conversions in an existing building are not required to meet this requirement.

a) Specialty Goods & Foods

Description: Businesses selling goods which can be for personal use including small scale items such as apparel and accessories, as well as large scale items such as furniture/home furnishings, appliances and electronics, bulk food, and miscellaneous retail.

i) Temporary (daytime) outdoor displays are permitted.

b) Eating & Drinking Establishments

Description: restaurants and drinking/entertainment establishments, including brew pubs.

c) Entertainment & Recreation

Description: Establishments providing commercial resources or activities for exercise, relaxation, or enjoyment.

d) Business & Personal Services

Description: Small to medium sized businesses providing services to local businesses and households.

i) Business Services includes uses such as copy, photo processing, fax & mailing centers.

ii) Personal Services includes uses such as barber and beauty salons, spas, laundry and drycleaning, and travel agencies.

e) Commercial Goods

Description: Businesses whose primary activity is the sale of goods typically for commercial use or that are otherwise not compatible with urban, pedestrian oriented districts such as vehicle sales & rental, construction supply, restaurant supply, automobile parts & accessories.

f) Commercial Services

Description: Businesses providing services to industry, services that are industrial in nature, or services that are otherwise not compatible with urban, pedestrian oriented districts.

2) Office

Description: Workplace uses including professional, administrative, medical, research and development, financial and educational activities for businesses, individuals and non-profit organizations.

3) Lodging

Description: Commercial lodging facilities including hospitality uses, such as hotels and bed & breakfasts.

4) Civic & Cultural

Description: Services including education, cultural institutions, and recreational facilities made available to the general public.

5) Residential

Description: Owner- and renter-occupied dwelling units.

a) Multi-Family with Multi-Family Lobby Entry

Description: Buildings designed as residence for multiple households.

b) Attached Single Family

Description: Attached buildings designed as a residence for one household with a dedicated entrance accessed directly from the sidewalk or publicly accessible open space.

c) Residential Care Facilities

Description: A building or group of buildings designed as a temporary residence where residents receive nursing or other support services from facility employees.

i) Residential care facilities are limited to 12 patients (except those meeting the definition of correctional institutions)

d) Home Occupation

Description: An occupation or profession which is customarily incidental to or carried on in a dwelling place, and not one in which the use of the premises as a dwelling unit is largely incidental to the occupation carried on by a resident.

i) There shall be no change in the outside appearance of the surrounding residential development.

ii) Home occupation shall not be conducted in an accessory building.

iii) The maximum number of employees not including the owner/occupant is limited to one per unit.

iv) Conditional: Work activities that require hazardous assembly, including fabrication, manufacturing, repair or processing operations such as welding and woodworking

e) Dormitory

Description: A building designed as a temporary residence for multiple students of an associated school, university, or other educational facility.

6) Transportation, Communication, and Infrastructure

Description: The basic installations and facilities that enable the continued function of transportation, data, and other utilities networks.

7) Industry, Manufacturing, and Warehousing

Description: A business involved in the storage, manufacture, research, or testing of goods and products

18.28.030 SCALE REGULATIONS

This section contains the Regulations that govern district scale such as building height and block size. Scale Regulations are set forth to ensure that the height of new buildings and the scale of new blocks are consistent with the scale of each Southcenter district and help establish a finer grained network of blocks and streets.

18.28.031 BUILDING HEIGHT

1) Definition

i) Height means the height of a building as calculated by the method in the Washington State Building Code (TMC 18.06.100).

2) Regulation

- i) Height for buildings is regulated by both the number of floors permitted and by vertical dimension permitted, measured in feet.
- ii) New structures must meet the minimum and maximum for both floor and dimension requirements.
- iii) The number of floors shall include all floors located above the finished grade. Portions of the building such as basements or podiums that are substantially or partly submerged shall not be counted as a floor as long as they do not extend more than 6 feet above the grade plane. Floors that extend more than 6 feet above the grade plane shall be counted as a floor.
- iv) The minimum and maximum number of floors and feet permitted for new structures shall be as specified by Scale Zone.

3) General Requirements

- i) Habitable attics, inhabited spaces located above a roof's eave line, are not permitted.
- ii) Portions of a building that are not part of the primary building mass, such as entrance porticos, bays and stoops, are not required to meet minimum height requirements.
- iii) Parking podiums are not required to meet minimum height requirements.
- iv) Portions of the building that extend above the primary building mass, such as dormers, roof-top cupolas, elevator and mechanical equipment enclosures, roof deck trellises, gazebos, and other special features, shall not exceed the maximum height requirement by more than 20 feet, provided they are set back 10 feet from the edge of the roof.
- v) Accessory buildings, including non-dwelling units such as freestanding garages for individual residential units, service structures and tool sheds, shall not exceed one and one-half stories or 14 feet.

vi) Corner Entry Private Frontages (see Section 18.28.043.2) shall not exceed the permitted maximum height by more than 20 feet.

18.28.032 SPECIAL HEIGHT LIMITS

1) Definition

i) A Special height limit restricts the maximum height of structures to establish a special scale in the following locations. See Figure 18.28.032 Special Height Limits.

2) TUC Boulevard Edge Limit

- i) This Special Height limit applies to all development located within 65 feet of the back-of-sidewalk indicated on Figure 18.28.012 Scale Map.
- ii) The maximum height in this location shall be as specified by Scale Zone.

3) Urban Pond Edge Limit

- i) This Special Height limit applies to all development located within 100 feet of the Tukwila Pond property lines indicated on Figure 18.28.012 Scale Map.
- ii) The maximum height in this location shall be as specified by Scale Zone.

4) Natural Pond Edge Limit

- i) This Special Height limit applies to all development located within 100 feet of the Tukwila Pond property lines indicated on Figure 18.28.012 Scale Map.

ii) The maximum height in this location shall be as specified by Scale Zone.

5) Urban River Edge Limit

i) This Special Height limit has two zones.

- (1) Zone 1: All development located within 125 feet of the Ordinary High Water Mark (OHWM) Setback lines indicated on Figure 18.28.012 Scale Map.
 - (2) Zone 2: All development located between 125 feet and 200 feet from the OHWM Setback lines indicated on Figure 18.28.012 Scale Map.
- ii) The maximum height within these zones shall be as specified by Section 9.3 of the Shoreline Master Plan. (Current proposal is 15 feet in the first 125 feet and 45 feet from 125 to 200 feet from OHWM, with some bonus height for provision of public access.)

6) Urban Core Limit

- i) This Special Height limit applies to any development located within 300 feet of Tukwila Parkway or Southcenter Parkway within the Urban Core Scale Zone Floors, as indicated on Figure 18.28.012 Scale Map.
- ii) The maximum height in this location shall be as specified by Scale Zone.
- iii) Development may only be allowed to apply the Urban Core Height limit provided that floors above 12 must be residential uses or housing, or residential uses or housing equal in area to the total non-residential square footage on floors 13 through 18 must be constructed in the Urban Core or General Urban zones.
- iv) If affordable or senior housing is constructed, the required area may be reduced by up to 1/3 by the DCD Director as a special permission decision.

FIG. 18.28.032 SPECIAL HEIGHT LIMITS

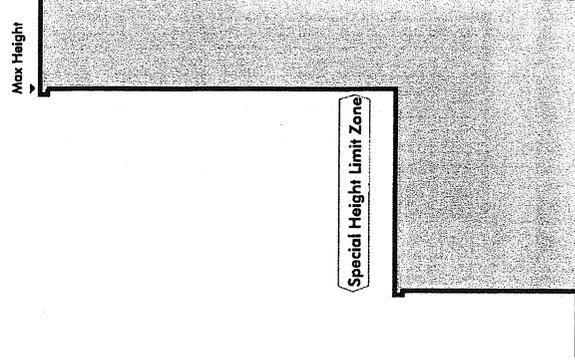


Exhibit C - Westfield 6/1 1/09 Comments (See Exhibit B for specific proposed text changes)

18.28.033 MAXIMUM TOWER BULK

1) Definition

- i) A Tower is defined as a building mass that exceeds 4 floors and 58 feet in height. See Figure 18.28.033 Maximum Tower Bulk.
- ii) Tower Bulk is defined as the length of the diagonal line connecting the farthest corners of the plan footprint of a tower. See Figure 18.28.033.

2) Regulation

- i) Tower building masses shall not exceed the Maximum Tower Bulk as specified by Scale Zone.

18.28.034 MAXIMUM BLOCK SIZE

1) Definition

- i) Block size is a measure of the total length of all street-fronting property lines enclosed within the nearest surrounding publicly accessible streets.

2) Regulation

- i) Development increments (properties or assemblages of contiguous properties) with a perimeter that exceeds the specified Maximum Block size standard must construct new publicly accessible streets in locations that result in the creation of city blocks that do not exceed the Maximum Block size.
- ii) New streets must be designed, configured, and located in accordance with Section 18.28.051 Provision of New Streets.
- iii) Maximum Block size standards shall be as specified by Scale Zone.

iv) For the purposes of determining block size, alleys are considered as part of the interior of a block. In no case do alleys qualify as defining the edges of a block.

v) For development increments bounded by rivers or ponds, property lines along the adjacent water body and pedestrian ways providing waterfront access may qualify as defining the edge of a block. In no other case shall pedestrian ways qualify as defining the edge of a block.

18.28.035 PERMITTED CORRIDOR TYPES FOR NEW STREETS

1) Definition

See Section 18.28.013 Form Standards for the definition and applicability of Corridor Types.

2) Regulation

- i) All new streets that are built shall be designated as a Corridor Type.
- ii) Pre-located Corridors have a pre-designated Corridor Type as established in Section 18.28.013 Form Standards and the Form Map.
- iii) The corridor type designation for all other new streets shall be selected by the developer from those corridor types that are permitted within the Scale Zone that the street will be built as indicated in 18.28.012 in the Scale Standards Chart.
- iv) All development along the new corridor shall be regulated by this Corridor Type designation as established in Section 18.28.013 Form Standards.
- v) New streets built to satisfy the Permitted Corridor Types shall be designed, configured and located in accordance with Section 18.28.051 Provision of New Streets.

FIG. 18.28.033 MAXIMUM TOWER BULK

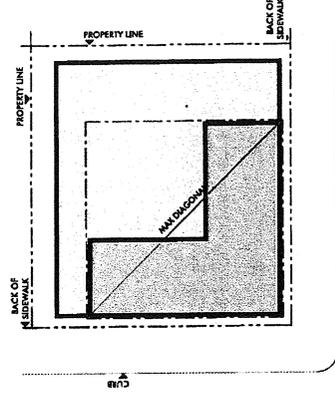
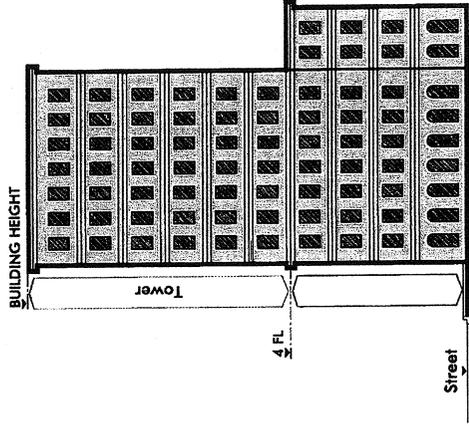


Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

18.28.043 PRIVATE FRONTAGE

1) Private Frontage Definition

- i) Private frontage includes both:
 - (1) Portions of a property between the back-of-sidewalk line and the primary building façade along any Street (see Section 18.28.042.3.ii) to determine how to locate back-of-sidewalk)
 - (2) Portions of all primary building facades up to the top of the first or second floor, including building entrances, located along and oriented toward streets as shown in Figure 18.28.043 Private Frontage - 1) Definition.

2) Private Frontage Types Definition

- i) A Private Frontage Type is a specific configuration of a building's Private Frontage elements that result in a unique type. The range of Private Frontage Types established is derived from the potential range of uses, scales, and forms of new development.
- ii) The definition and physical configuration of each Private Frontage Type is established by the text, plan, and section graphics in Section 18.28.043.A-L) Private Frontage Types. The "x" in each section graphic represents the front yard setback distance.

3) Private Frontage Type Regulations

- i) All buildings shall be designed to incorporate a Private Frontage Type designed in compliance with this regulation.
- ii) Private Frontage Types regulate the configuration of a building's primary entrance, the treatment of its front and side setback areas, and the type of features permitted to encroach into the required setback areas (as shown in Section 18.28.042.A-L) Private Frontage Types).
- iii) A property's permitted and/or required Private Frontage Types shall be limited to those frontage types specified for each Corridor Type within the Form Standards Chart.
- iv) All permitted frontage types for a single Corridor Type are allowed either alone or in combination with any other permitted frontage type within a single building.
- v) Private frontage regulations apply along the full length of the property frontage, even where there is no building façade.

4) Building Orientation

- i) Where building orientation is not required, buildings must still satisfy Edge Treatment requirements (Section 18.28.043.8) but are not required to locate an entrance that opens directly on to that street.

5) Corner Parcels

- i) On corner parcels, frontage treatment shall extend along the entire length of the back-of-sidewalk line for both street frontages as shown in Figure 18.28.043. Private Frontage - 5) Corner Parcels.

6) Access

- i) The configuration of any Private Frontage Type shall not create a hallway configuration for entry to any ground floor unit, in which the sole access path for that entry has a wall or railing that requires walking past one or more other entry doors.
- ii) Ground floor multi-family residential units shall have dedicated entrances wherever possible.
- iii) Grand Portico, Stoop, and Porch Types are defined as having the sidewalk grade connect via a stair to the higher elevation finished floor grade at the entry, for reasons of privacy separation.

7) Weather Protection

- i) Non-residential private frontages shall provide pedestrian weather protection along adjacent sidewalks or open spaces, such as awnings, canopies, or building overhangs.
- ii) Weather protection shall create a covered pedestrian space a minimum of 5 feet in depth, with an overhead clearance between 8 and 12 feet. See Section 18.28.103 Architectural Elements Regulations for additional design standards and guidelines related to awnings, canopies and weather protection.
- iii) A zero-setback areas, building overhangs such as trellises, canopies and awnings may extend horizontally into the public frontage up to a maximum of 6 feet and no closer than 2 feet from the back of the curb.

8) Edge Treatments

- i) Fenced Edge, Terraced Edge, and Flush Edge are edge treatments that are combined with other Private Frontage Types and establish a desirable relationship between front setback areas and the public sidewalk. When landscaping Grand Portico, Forecourt, Grand Entry, Stoop, Porch, and Front Door setback areas, an edge treatment must be selected from those permitted for the given Use Zone and applied to the setback area in accordance with the specified edge treatment's regulations.

FIG. 18.28.043 PRIVATE FRONTAGE - 1) DEFINITION

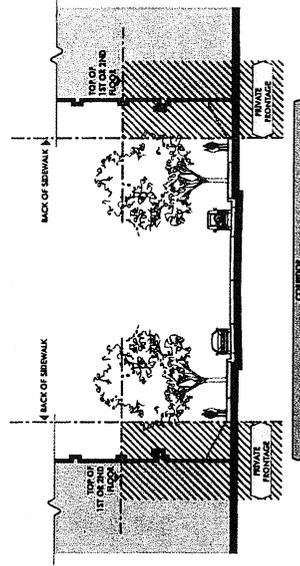
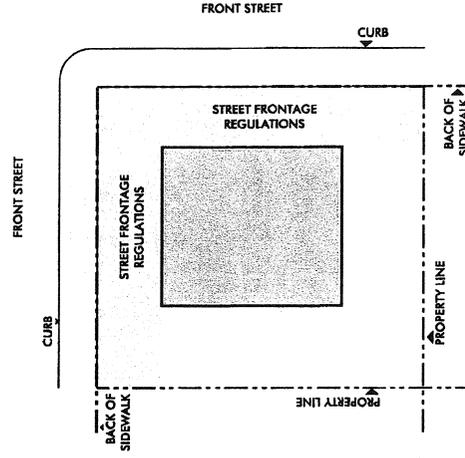


FIG. 18.28.043 PRIVATE FRONTAGE - 5) CORNER PARCELS

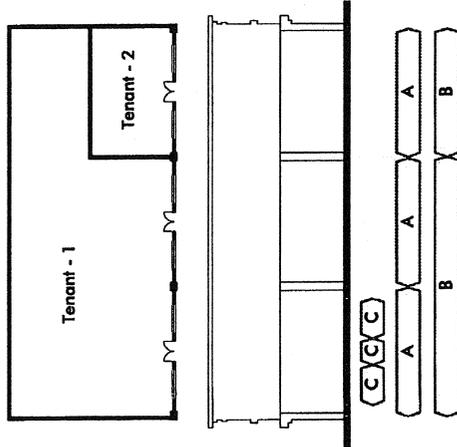


18.28.043.9 PRIVATE FRONTAGE TYPES

A) SHOPFRONT

The Shopfront Frontage Type defines the primary treatment for ground-level commercial uses oriented to display and access directly from public sidewalks. Each Shopfront must contain at least one primary building entrance. It shall have clear glass display windows framed within storefront pilasters and base. Shopfront massing regulations include a minimum transparency requirement for the area between the height of 2 and 7 feet along the length of the building facade facing the street or public sidewalk. A minimum 3 foot zone behind the window glazing must provide an unobstructed view of the establishment's goods & services. Entrances are constructed at sidewalk grade (see Section 18.28.103 Architectural Elements Regulations for additional standards and guidelines for entrances). Shopfront composition should include projecting signs, as well as window signs and awning signs. Close proximity to high volumes of pedestrian traffic make attention to craft and visual interest within the storefront facade important. Shopfront and awning design should vary from shopfront to shopfront (see Section 18.28.043.7 Weather Protection for additional standards and guidelines on awnings and canopies). Shopfronts are built up to the back of the public sidewalk, and any setback areas must be treated as extensions of the sidewalk space. Recessed entrances are permitted with a maximum width of 15 feet. Restaurant shopfronts may set back a portion of the shopfront facade to create a colonnaded outdoor dining alcove that is a maximum of 12 feet deep. The set back portion of facade that is oriented towards the street must have display windows. The alcove must also have columns along the sidewalk at a maximum spacing of 15 feet on center. The alcove may not rely on adjacent buildings for enclosure. The Shopfront frontage type is specifically intended to provide block frontages with a multiplicity of doors and display windows – so Shopfront width must generally be kept to a minimum and shall not exceed the lengths shown in the Shopfront Regulations Chart.

ILLUSTRATION OF REGULATION TERMS



- A- Shopfront Length is the length of each Shopfront Frontage Type segment as measured from centerline to centerline of the articulation elements at either edge of the Shopfront segment.
- B- Tenant Length is the length of each Tenant Frontage that faces directly onto a Street.
- C- Articulation Increment is the length between each Articulation Element in a Shopfront segment as measured from centerline to centerline of permitted Shopfront Length Articulation Elements (see 18.28.102.2 Building Length Massing Regulations)

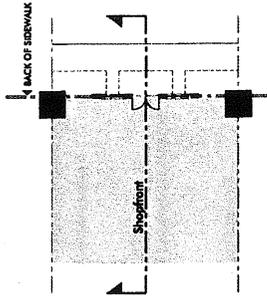
SHOPFRONT REGULATIONS CHART

Corridor Type	Urban Corridor & Urban Waterfront Corridor	Primary City, Secondary City & Natural River Corridors	TUC Boulevard & Commercial Corridor	Sub-Urban Corridor
REGULATIONS				
18.28.043.1) Shopfront Massing (include as part of shopfront frontage type)				
Shopfront Length - maximum	50 ft	80 ft	160 ft	320 ft
Tenant Length - maximum	50 ft	80 ft; 160 ft conditional	320 ft	n/a
Articulation Increment - maximum	30 ft	40 ft	80 ft	120 ft
Shopfront Transparency (2 to 7ft)* - minimum	80%	70%	50% - 70%	no min / 50% (along APE&W)

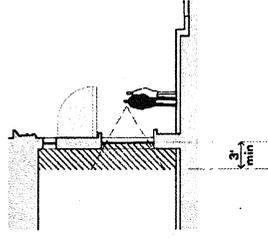
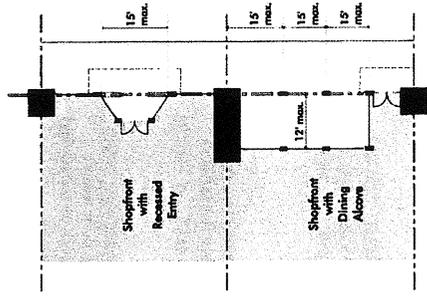
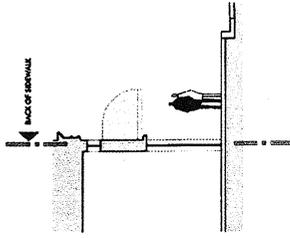
(APE&W): Andover Park East & West

* Applies to the area between the height of 2 to 7 feet. Darkly tinted windows shall not qualify as transparent.

PLAN



SECTION



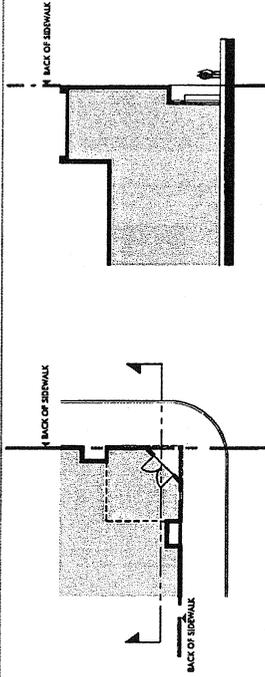
Unobstructed View Required

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

18.28.043.9 PRIVATE FRONTAGE TYPES

PLAN

SECTION

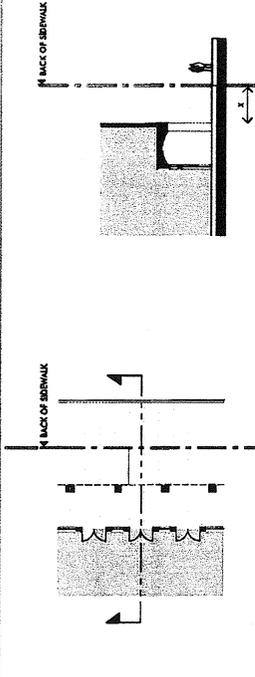


B) CORNER ENTRY

A Corner Entry is a distinctive building entry element to emphasize the corner of a building. This frontage differentiates the corner of the building primarily through vertical massing and articulation with elements such as a corner tower, which is created by articulating a separate, relatively slender mass of the building, continuing that mass beyond the height of the primary building mass, and providing the top of the mass with a recognizable silhouette. A corner entry mass may encroach into the required setback areas but may not encroach into the public right-of-way. Corner entry features may also exceed the permitted height limit by 20 feet. Other elements can be used to create a Corner Entry but must place a similarly significant emphasis on the corner. Such elements include façade projections/recessions, balconies, roof articulation, and changing repetitive façade elements such as window type.

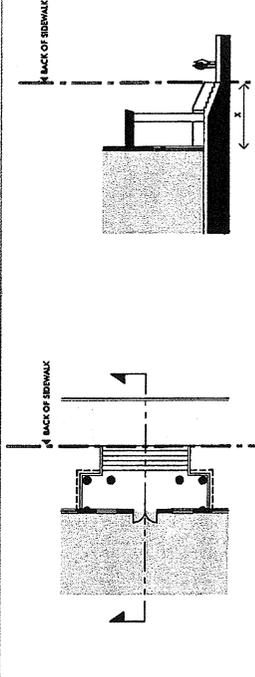
C) ARCADE

An arcade is a colonnaded space at the base of a building running along the sidewalk resulting in a covered sidewalk space. This frontage type requires the ground floor to be constructed at or close to sidewalk grade, and so is not appropriate for buildings with ground-level residential use. Minimum arcade width is 12 feet, and maximum column spacing along the street is 15 feet. Ceiling beams and light fixtures that are located within the column spacing geometry greatly enhance the quality of the space and are recommended. Setback areas must be treated as an extension of the sidewalk space.



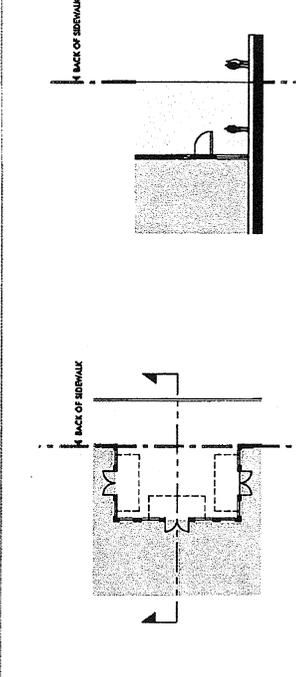
D) GRAND PORTICO

A portico is a roofed entrance supported by columns appended to the primary plane of the building's front façade. The portico may encroach into the front setback area. A "Grand Portico" is a portico expressed at a civic scale, meant to project the image of an important community building. A Grand Portico is an appropriate frontage for civic buildings such as city halls, libraries, post offices, as well as for quasi-civic buildings such as hotels with ground level convention facilities, or movie theaters. This frontage type is not typically appropriate for residential buildings. A "grand stair" makes an excellent appendage to a grand portico frontage. Setback areas must be landscaped for non-commercial buildings and may be paved for commercial buildings.



E) FORECOURT

A forecourt is a courtyard forming an entrance and lingering space for a single building or several buildings in a group, and opening onto the public sidewalk. The forecourt is the result of setting back a portion of the primary building wall. It must be enclosed on three sides by building masses on the same property, and therefore cannot be built on corners, or adjacent to a building already set back from the sidewalk. The forecourt opening shall be a maximum of 30 feet wide. It may feature a decorative wall or fence on the sidewalk side that creates a gateway into the forecourt. A forecourt can be appropriate for ground floor or upper floor residential uses when combined with stoops or flush single entries, or can be combined with shopfront frontage types for retail and office developments. When combined with stoops, the courtyard may be slightly raised from sidewalk grade and landscaped or paved, with a decorative wall along the sidewalk edge. When combined with retail, restaurant and service uses, all three sides of the courtyard must feature shopfront entrances and display windows and the forecourt must be treated as an extension of the sidewalk space. Any setback area treatment is determined by the development's primary frontage type.



18.28.044 SETBACKS

1) Front Yard Setback

- a) Definition
 - i) Front Yard Setback is defined as the distance from the back-of-sidewalk line to the primary building façade as shown in Figure 18.28.044 Front Yard Setback (see Section 18.28.042.3.ii to determine how to locate back-of-sidewalk)
- b) Regulation
 - i) All development shall be sited such that minimum and maximum Front Yard Setback dimensions are met.
 - ii) The minimum and maximum required setback dimension shall be as specified by Corridor Type.
 - iii) The front yard setback for each Private Frontage Type shall be measured as depicted by the Private Frontage Type illustrations.

c) General Requirements

- i) Front Yard setback areas must be landscaped per Section 18.28.071 Setback Areas.
- ii) At required setback areas, arcades, awnings, entrance porticos, porches, stoops, stairs, balconies, bay windows, eaves, covered and entrance overhangs, are permitted to encroach within the required front street setback as shown in the frontage type illustrations. Encroachments may extend up to a maximum of 6 feet into the private frontage.
- iii) At zero-setback areas, building overhangs such as trellises, canopies and awnings may extend horizontally into the public frontage up to a maximum of 6 feet and no closer than 2 feet from the back of curb. These overhangs must provide a minimum of 8 feet clear height above sidewalk grade.

2) Side Yard Setback

- a) Definition
 - i) Side Yard Setback is defined as the distance from the side property line to any building as shown in Figure 18.28.044.2 Side Yard Setback.
- b) Regulation
 - i) All development shall be sited such that minimum Side Yard Setback dimensions are met.
 - ii) The minimum required setback dimension to structures with living space windows and structures without living space windows shall be as specified by Corridor Type.

c) General Requirements

- i) The side yard setback area must be landscaped per Section 18.28.071 Setback Areas.

3) Rear Yard Setback

- a) Definition
 - i) Rear Yard Setback is defined as the distance from the rear property line to any building as shown in Figure 18.28.044.3 Rear Yard Setback.
- b) Regulation
 - i) All development shall be sited such that minimum Rear Yard Setback dimensions are met.
 - ii) The minimum required setback dimension shall be as specified by Corridor Type.

c) General Requirements

- i) The rear yard setback area must be landscaped per Section 18.28.071 Setback Areas.

4) Alley Setback

- a) Definition
 - i) Alley setback is defined as the distance from an alley right-of-way to any building as shown in Figure 18.28.044.4 Alley Setback.
- b) Regulation
 - i) All development shall be sited such that minimum Alley Setback dimensions are met.
 - ii) The minimum required setback dimension shall be as specified by Corridor Type.

c) General Requirements

- i) The alley setback area must be landscaped according to the principles set forth in Section 18.28.071 Setback Areas.

FIG. 18.28.044 FRONT YARD SETBACK

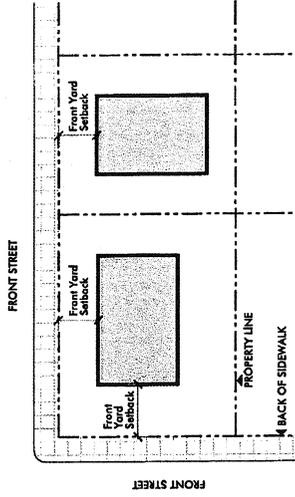


FIG. 18.28.044.2 SIDE YARD SETBACK & FIG. 18.28.044.3 REAR YARD SETBACK

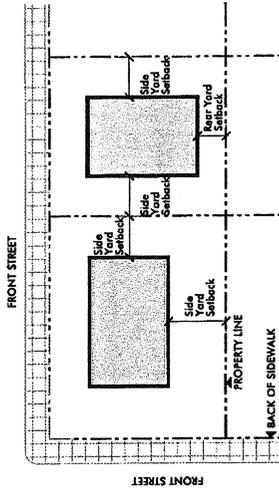


FIG. 18.28.044.4 ALLEY SETBACK

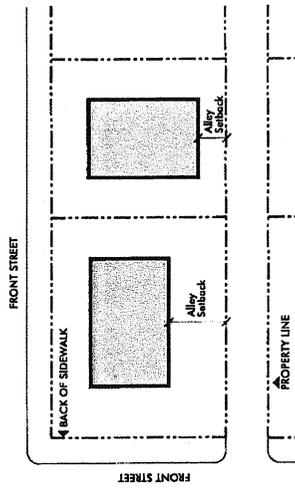


Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

18.28.045 FRONTAGE COVERAGE

1) Definition

- i) Frontage coverage is defined as the percentage of the length of the frontage coverage zone that is occupied by a primary building façade(s).
- ii) The frontage coverage zone is defined as the space between the minimum and maximum front yard setback lines and the minimum side yard or front yard setback lines as shown in Figure 18.28.045 Frontage Coverage.
- iii) In Districts where there is no maximum front yard setback, the frontage coverage zone shall extend from the minimum front yard setback lines to the furthest side or rear property line.

2) Regulation

- i) All development shall include buildings sited within the frontage coverage zone such that minimum frontage coverage requirements are met.
- ii) Minimum Frontage Coverage percentages shall be as specified by Corridor Type.

3) Exceptions

- i) In order to provide vehicular access to parking areas in the interior or at the rear of a parcel if no other access is available, vehicular breezeways may count toward frontage coverage requirements:
 - (1) A vehicular breezeway is a covered driveway penetrating the building.
 - (2) The width of a vehicular breezeway shall not exceed the width of the curb cut plus the width of an adjacent pedestrian sidewalk.
- ii) In order to connect the public sidewalk with active open spaces, courtyards, parking areas, and alleys in the interior or at the rear of a parcel, pedestrian breezeways may count toward frontage coverage requirements:
 - (1) A pedestrian breezeway is covered walkway penetrating the building for pedestrian use only.
 - (2) The width of a breezeway shall not exceed 15 feet

18.28.046 BUILT TO CORNER

1) Definition

- i) Built to corner is defined as a portion of a building that occupies the build to corner zone at the intersection of two streets.

FIG. 18.28.045 FRONTAGE COVERAGE

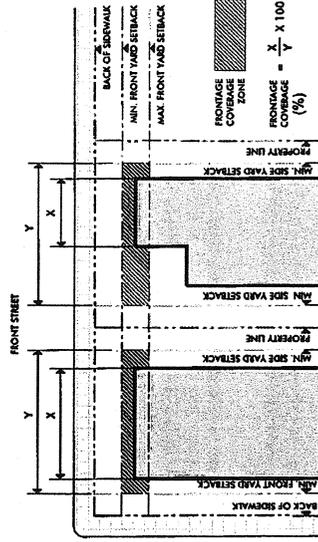
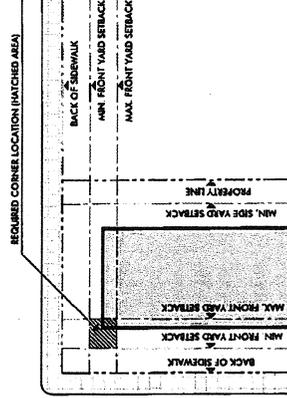


FIG. 18.28.046 BUILT TO CORNER



- ii) The build to corner zone is defined as the space between the required minimum and maximum front yard setback lines for each intersecting streets as shown in Figure 18.28.046 Build To Corner.

2) Regulation

- i) All development shall include buildings sited within the build to corner zone such that minimum build to corner requirements are met.
- ii) Build to corner is required on all corner parcels where it is required by Corridor Type.

18.28.047 SPECIAL CORNER LOCATION

1) Definition

- i) A Special Corner Location is the corner of an important intersection that shall be emphasized using building placement and architectural features.
- ii) Special Corner Locations shall be as shown on the Figure 18.28.013 Form Map.

2) Regulation

- i) Development at Special Corner Locations shall include buildings that satisfy Section 18.28.049, Build To Corner requirements.
- ii) Special Corner Location buildings shall incorporate a Special Corner Feature (see 18.28.047.3).

3) Special Corner Feature

- i) A Special Corner Feature is a distinctive building element to emphasize the corner of a building primarily through:
 - (1) Vertical massing and articulation with elements such as a corner tower, which is created by articulating a separate, relatively slender mass of the building, continuing that mass beyond the height of the primary building mass, and providing the top of the mass with a recognizable silhouette.
 - (2) Other elements can be used to create a Special Corner Feature but must place a similarly significant emphasis on the corner. Such elements include façade projections/recessions, balconies, roof articulation, and changing repetitive façade elements such as window type.
- ii) Special Corner Feature masses may encroach into the required setback areas but may not encroach into the public right-of-way.
- iii) Special Corner features may exceed the permitted height limit by 20 feet

18.28.060 OPEN SPACE REGULATIONS

This section contains Regulations and Guidelines for the provision, design, and configuration of new open spaces that may be publicly accessible. Open Space Regulations are set forth to ensure that the provision, design, and configuration of new open spaces contribute to the character of and support the type of development desired within each District. Open spaces may consist of pedestrian spaces for commercial uses, or common and private open space for residential uses.

All new open spaces, whether or not they are required by Provision of Open Space regulations, shall be designed and configured according to the following regulations.

18.28.061 PROVISION OF OPEN SPACE

Provision of Open Space regulations set forth requirements for the provision and design of pedestrian, common and private open spaces by Use Zone and Use Type.

These regulations are established to ensure a wide range of public spaces that complement the primary public streets and open spaces in each district as the Southcenter area intensifies.

1) General Open Space Regulations

- i) Provision of open spaces for commercial and residential uses are required as specified in the 18.28.061 Provision of Open Space Chart.

18.28.061. Provision of Open Space Chart

Use Zones	Regional Center	TOD's & Pond District	Workplace & Commercial Corridor
Use Type	Required Type/Amount of Open Space (Minimums)		
Retail	Pedestrian Space: 50 sqft/1000 sqft	Pedestrian Space: 50 sqft/1000 sqft	---
Office	---	Pedestrian Space: 50 sqft/1000 sqft	Pedestrian Space: 100 sqft/1000 sqft
Lodging	---	Pedestrian Space: 50 sqft/room	Pedestrian Space: 100 sqft/room
Civic & Institutional	---	---	---
Residential:	100 sqft/DU. May be provided as common or private space, or a combination.	Common Space: 100 sqft/DU Private Space: 50 sqft/DU	---
Transportation, Communication, and Infrastructure	---	---	---
Industry, Manufacturing, and Warehousing	---	---	---

Legend

/1000 sqft. per 1000 sqft of usable floor area

--- : Not Required

- ii) The amount of area needed to satisfy Pedestrian and Common open space requirements for a development shall not exceed 50% of the lot size.

iii) Open Space for commercial and residential uses shall be built within the development by developers as development occurs.

iv) Options for Provision of Open Space:

- (1) All streets built per Section 18.28.051 Provision of New Streets, may be counted toward meeting Provision of Open Space requirements for Pedestrian Space. They may not be used to satisfy Common and/or Private Open Space Requirements for Residential Uses.
- (2) In instances where small or awkwardly shaped properties make the provision of on-premises pedestrian space for commercial uses or residential common open space impractical, the DCD Director may permit the in-lieu payment of the cost to construct the required amount of usable open space off-premises. Fees-in-lieu must be used for designated open space within that district or within 1,000 feet of the project premise.
- (3) At the discretion of the DCD Director, required pedestrian space for commercial uses or residential common open space may be constructed off-premises and/or as part of a larger open

space being provided by the City or other private developments within that district or within 1,000 feet of the project premises

2) Pedestrian Space for Commercial Uses

- a) Definition
 - i) Provision of pedestrian space for commercial uses means publicly accessible, outdoor landscaped spaces used primarily for active or passive community recreation and civic purposes.
 - ii) Pedestrian spaces for commercial uses are privately owned and maintained.
- b) Pedestrian Space Design Requirements
 - i) Pedestrian spaces shall be designed as one of the Pedestrian Space Types defined in Section 18.28.062 Open Space Types.
 - ii) Pedestrian spaces shall be connected to public sidewalks and about public rights-of-way on at least one side.
 - iii) Pedestrian spaces shall be located where they are visible and easily accessible to the public from adjacent sidewalks and avoid masses of shrubs around edges. The space shall not be more than 2 feet above or below the adjacent sidewalk.
 - iv) Pedestrian spaces shall be comprised of a greater proportion of hardscape (paved areas), than softscape (grass or other landscape material).
 - v) Pedestrian spaces shall be a minimum of 500 square feet in size, and not less than 20 feet wide.
 - vi) Pedestrian spaces shall be located to take advantage of sunlight to the greatest extent possible.
 - vii) Site design features that create entrapment areas in locations with pedestrian activity shall be avoided.
 - viii) Development shall incorporate Crime Prevention Through Environmental Design (CPTED) principles into open space site design.
 - ix) Pedestrian spaces shall not be located adjacent to dumpster enclosures, loading/service areas, or other incompatible uses unless fully screened with an architecturally consistent wall or solid fence (no chain link) and landscaping.
 - x) Rooftop utilities shall be adequately screened and separated from rooftop pedestrian spaces.
- c) Pedestrian Space Design Guidelines
 - i) Pedestrian spaces should provide a variety of seating options, including benches, seating steps, planters, landscaping features, or low walls.

① Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

18.28.070 LANDSCAPING REGULATIONS

This section contains Requirements and Guidelines governing the provision, design and configuration of landscaping in front, side and rear yards, public frontage areas, and other on-site areas.

18.28.071 SETBACK AREAS

1) Regulations

- i) Figure 18.28.071 Landscape Requirements Chart sets forth landscaping requirements for front, side, rear, and alley setback areas.
- ii) Landscape Types for setback areas are organized by private frontage type and use zone. Setback areas shall be treated as one of the following landscaping types, as specified in the Landscape Requirements Chart.

2) Front Yard Setback Area Landscaping Types

- a) Paved / Sidewalk Extension

- i) Provide paved pedestrian areas along the back-of-sidewalk that enhance/enlarge the public frontage. Landscaping treatment shall consist of:
 - (1) Front setback areas paved as extensions of the public sidewalk

b) Visual Softening / Enhancement – Informal

- i) Cover front yard setback areas with landscaped, pervious surfaces that visually soften and enhance the built environment. Landscaping treatment shall consist of:
 - (1) Pathways connecting the public sidewalk to the front door and to any parking areas
 - (2) Living groundcover on 90% of the landscaped area established within 3 years
 - (3) 1 tree per 500 square feet of landscaped setback area or 1 tree per 30 linear feet of frontage (excluding curb cuts) whichever results in more trees.

- (4) Trees shall be planted in an informal pattern and consisting of a mix of deciduous and evergreens

- (5) 1 shrub per 7 linear feet of frontage, excluding curb cuts

c) Visual Softening / Enhancement – Formal

- i) Cover front yard setback areas with landscaped, pervious surfaces that visually soften and enhance the built environment. Landscaping treatment shall consist of:
 - (1) Pathways connecting the public sidewalk to the front door and to any parking areas
 - (2) Living groundcover on 90% of the landscaped area established within 3 years
 - (3) 1 tree per 30 linear feet of frontage (excluding curb cuts)
 - (4) Trees shall be planted in a formal pattern at a maximum average spacing of 30 feet on center.
 - (5) One shrub for each 7 linear feet of frontage, excluding curb cuts, planted in a formal pattern.

3) Side, Rear and Alley Setback Area Landscape Types

a) Groundcover

- i) Cover side and rear yard setback areas with landscaped, pervious surfaces. Landscaping treatment shall consist of:
 - (1) Living groundcover on 90% of the yard area established within 3 years.

b) Moderate Screening

- i) Provide light visual separation along property lines between somewhat incompatible development. Landscaping treatment shall consist of:
 - (1) Landscaping that screens parking/service areas and blank side and rear building facades.
 - (2) Landscaping that maintains views to building entrances and signage
 - (3) 1 tree per 20 linear feet of property line (excluding curb cuts) spaced regularly and consisting of a mix of deciduous and evergreen trees along the applicable property line
 - (4) 1 shrub per 5 linear feet of frontage, excluding curb cuts
 - (5) Living groundcover on 90% of the yard area established within 3 years.

18.28.071 Landscape Requirements Chart

Front Yard Setback Areas		Paved/Sidewalk Extension		Softening - Informal		Softening - Formal	
Landscaping Types							
Private Frontage Types							
Shop-Front		required		---		---	
Corner Entry		required		---		---	
Arcade		required		---		---	
Grand Portico		optional (commercial)		optional		optional	
Forecourt		per primary frontage		per primary frontage		per primary frontage	
		type		type		type	
Common Lobby Entry		optional		optional		optional	
Stoop		optional		optional		optional	
Porch		---		optional		optional	
Front Door		---		optional		optional	
Side Yard, Rear Yard, Alley Setback Areas							
Landscaping Types		Groundcover		Moderate Screening		Heavy Screening	
Use Zones							
Regional Center		optional		---		---	
Pond District		required		---		---	
TOD - Urban District		required		---		---	
TOD - River District		required		optional		optional	
TOD Station District		required		optional		optional	
Commercial District		required		optional		optional	
Workplace District		required		required		required	

Legend
 required: these are required elements of all new development as indicated
 ---: not permitted
 optional: these elements are allowed by right unless otherwise specified

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

18.28.093 GENERAL PARKING REQUIREMENTS

1) Vehicular Access

- i) Location
 - (1) Access to parking facilities and loading areas shall be provided from alleys or adjacent parking lots wherever existing or new alleys are available.
 - (2) If alleys are not available, access to parking facilities and loading areas shall be provided from side streets wherever side streets are available.
 - (3) If neither alleys nor side streets are available, access to parking facilities and loading areas may be provided from front streets.

ii) Curb Cuts and Driveways

- (1) When access to parking facilities and loading areas are provided from front or side streets, the maximum number of curb cuts associated with a single development, shall be one two-lane curb cut or two one-lane curb cuts.
- (2) The maximum width of driveways/curb cuts is 12 feet for a one-lane and 24 feet for a two-lane driveway. In the Workplace District, the maximum width of driveways/curb cuts is 35 feet.
- (3) The total width of parking access openings on the ground level of structured parking may not exceed 30 feet.
- (4) Driveways shall be set back a minimum of five feet from adjoining properties (unless the driveway is shared with adjacent premises), and a minimum of three feet from adjacent buildings.

2) Parking Lots

- i) Surface parking lots shall setback a minimum of five feet from any back-of-sidewalk, open space, or building facade. The setback shall be planted with Visual Softening Informal/Formal landscaping, as defined in Section 18.28.071.2 Landscaping.
- ii) Surface parking lots shall be buffered from adjacent commercial development with Moderate Screening (see Section 18.28.071.3 Landscape Types)
- iii) Surface parking lots shall be buffered from adjacent residential development with Heavy Screening in the side and rear setback areas (see Section 18.28.071.3 Landscape Types).
- iv) For surface parking lots adjacent to public or private streets:

- (1) A minimum of 25 square feet of interior parking lot landscaping is required for each parking stall. In the workplace district, a minimum of 15 square feet is required for warehouse and light industrial uses.

- (2) Landscape islands shall be placed at the ends of each row of parking to protect parked vehicles from turning movements of other vehicles.

- (3) To subdivide continuous rows of parking stalls, landscape islands shall be placed at a minimum spacing of one island every five parking spaces.

- (4) Trees shall be planted in curbed landscaped islands or in flush tree wells with tree guards.

- v) For surface parking lots located behind buildings or otherwise screened from public or private streets or public spaces:

- (1) A minimum of 15 square feet of interior parking lot landscaping is required for each parking stall. In the workplace district, a minimum of 10 square feet of interior parking lot landscaping is required for warehouse and light industrial uses.

- (2) Landscape islands shall be placed at the ends of each row of parking to protect parked vehicles from turning movements of other vehicles.

- (3) To subdivide continuous rows of parking stalls, landscape islands shall be placed at a minimum spacing of one island every ten parking spaces.

- (4) Trees shall be planted in curbed landscaped islands or in flush tree wells with tree guards.

- vi) The minimum size for interior parking lot landscape islands is 100 square feet. Landscape islands shall be a minimum of 6 feet in any direction and generally the length of the adjacent parking space.

- vii) A minimum of one evergreen or deciduous tree is required per landscape island with the remaining area to contain a combination of shrubs, living groundcover, and mulch. See also General Landscaping Requirements and Guidelines in Section 18.28.080 under Site Design section).

- viii) Raised curbs or wheel stops shall be used adjacent to tree wells and planter areas to protect landscaping from car overhangs.

- ix) Rooftop Parking Landscaping. For a parking area on the top level of a parking structure, one planter that is 30 inches deep and 5 feet square must be provided for every 8 parking stalls on the top level of the structure. Each planter must contain a small tree or large shrub suited to the size of the container and the specific

site conditions, including desiccating winds. The planter shall be clustered with other planters near driving ramps or stairways to maximize visual effect.

b) Pedestrian Circulation

- i) Parking Lots shall provide clear pedestrian-only circulation routes between main building entrances and sidewalks.

- (1) Front surface parking lots shall provide such routes at a maximum spacing of every 300 feet.

- ii) Pedestrian circulation routes through surface parking lots shall be a minimum of 6 feet in width and separated from vehicular areas by curbing and landscaping. High traffic walkways should be wider.

- iii) Decorative, contrasting paving, such as pavers, bricks, stamped asphalt, or scored concrete, shall be used where pedestrian circulation routes cross driveways or other paved areas accessible to vehicles.

- iv) Accessible car and van parking with signage and striping for access to the building shall be provided per the Americans with Disabilities Act (ADA).

c) Lighting and Safety

- i) Parking and loading areas shall include lighting capable of providing adequate illumination for security and safety, provide clear views both to and within the site, and be in scale with the height and use of the associated structure. See also Lighting Requirements and Guidelines in Section 18.28.080 under site design section.

3) Drive-Through Facilities

- i) Stacking lanes shall be located to the rear of a building.

- ii) Stacking lanes shall be designed so as to accommodate expected queuing.

4) Parking Structures

- i) Parking Structures shall be located and designed to minimize their impact on public streets and public spaces.

- ii) Parking Structures shall be buffered from adjacent residential development with Heavy Screening (see Section 18.28.071.3 Landscape Types).

- iii) See Section 18.28.100 Architecture Design Regulations and the City of Tukwila's Parking Structure Design Manual (Ordinance 1968, Dec. 2001) for additional requirements and guidelines regulating parking structures, parking podiums, and garages.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

18.28.094 GENERAL PARKING GUIDELINES

1) Vehicular Access

- i) Access to adjacent parking lots should be consolidated and shared to reduce the number of curb cuts.
 - ii) Exterior driveway surfaces should be paved with non-slip, attractive surfaces such as interlocking unit pavers or scored and colored concrete.
- 2) Parking Lots
- a) Landscaping
 - i) Trees in parking areas, when mature, should be large and have a high-branching, broad-headed form to create maximum shade.
 - ii) Landscaping in parking lot interiors and at entries should not obstruct a driver's clear sight lines to oncoming traffic.
 - iii) Evergreen shrubs shall be used to screen parking lots along street frontages.

1 →

b) Pedestrian Access

- i) The main pedestrian route from a parking lot to a building entrance should be easily recognizable, accessible, and demarcated by special paving or landscaping, such as a shaded promenade, trellis, or ornamental planting.

2 →

3) Loading Zones

- i) Loading zones should be separated from customer and occupant pedestrian areas.

4) Sustainability

- i) Parking lots should utilize permeable paving systems and bio-filtration swales wherever possible.
- ii) The size of surface parking lots should be minimized to reduce surface water runoff and minimize heat island effects.
- iii) Rooftop Gardens or other rainwater capture and recycling systems are encouraged on flat sections of parking structure roofs in order to facilitate storm-water management, as well as add visual interest to the structure.

3

5) Bicycle Parking

i) Short Term Parking

- (1) Recommended bicycle rack types include an inverted "U", a "post and loop", or other type of rack that supports a bicycle upright by its frame in two places. Wave style racks are not recommended.
 - (2) Bicycle racks should be easy to find and located no more than 50 feet from the entrance of destinations.
 - (3) Racks should be located within sight of gathering places or in busy pedestrian areas that provide constant, informal surveillance of bikes and accessories.
 - (4) Racks should be oriented to maximize their efficiency and to aligned to keep obstructions away from pedestrian thoroughfares.
 - (5) Clustered arrangements of racks should be set back from walls or street furniture to allow bikes to be parked at both ends or from either side.
 - (6) Where more than one rack is installed, the minimum separation between aisles should be 48 inches (the aisle is measured from tip to tip of bike tires across the space between racks). This provides enough space for one person to walk one bike. In high traffic areas where many users park or retrieve bikes at the same time, the recommended minimum aisle width is 72 inches.
 - (7) Building overhangs, canopies or other features should be used to provide weather protection.
- ii) Parking at the Workplace
- (1) Secure bicycle storage areas should be used to park bikes for a full working day.
 - (2) Bike storage areas should be located in high visibility areas close to elevators, stairs and entrances.
 - (3) Bicycle parking should always be protected from the elements either indoors, covered by building elements, or in a separate shelter.
 - (4) Bicycle storage areas should be located as close or closer to elevators or entrances than the closest car parking space, and no more than 200 feet from access points.
 - (5) Multiple buildings should be served by many small racks in convenient locations rather than a combined, distant rack area.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

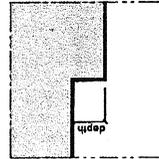
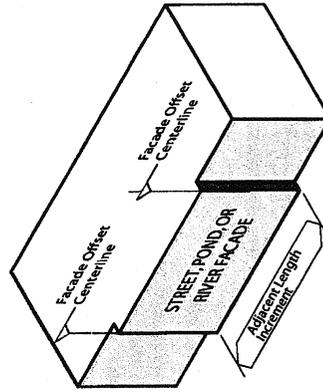
b) Length Massing Elements - Requirements

The following are permitted Length Massing Element types. All permitted element types may be used either alone or in combination with any other permitted element type to satisfy the Street, Pond, or River façade Length Increment requirement.

i) Façade Offset

(1) Street, Pond, or River façade or Shopfront:

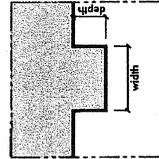
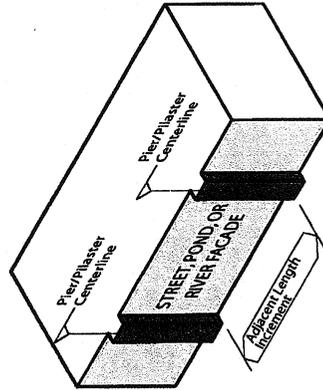
The horizontal depth of a façade offset shall be a minimum of five percent of the width of the largest adjacent horizontal façade segment. (see diagram below)



ii) Pilaster/Pier

(1) Shopfront only:

The horizontal width of a protruding pilaster or pier shall be a minimum of five percent of the width of the largest adjacent horizontal façade segment. The setback of wall surface from the face of the pilaster or pier shall be a minimum of 1/4 of the pier width (see diagram below). Pilasters/Piers shall not protrude into the public right-of-way.



iii) Notch

(1) Street, Pond, or River façade or Shopfront:

The width of a façade notch shall be a minimum of five percent of the width of the largest adjacent horizontal façade segment. The depth of the notch shall be at least 1/4 of the notch width (see diagram below).

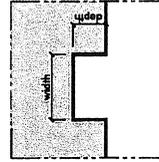
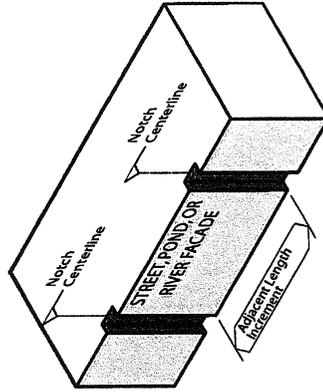


Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

1. Façade Standards

Overall wall composition for Street, Pond, or River façades shall contain at least 20% glazed area (not including parapet walls or shopfronts) in order to provide daylighting into tenant space and minimize blank walls facing sidewalks. Overall wall composition for Side and Rear façades does not have a minimum glazing requirement.

a) Building Base

See Section 18.28.102.1 for required Building Base regulations. There are no additional Building Base standards.

b) Façade Composition

- i) Façade projections into setback areas shall be as permitted within Section 18.28.044.1.c.ii Front Yard Setback.
- ii) Balcony and porch walls shall not be configured as a completely solid barrier. They shall have a minimum of 20% open or glazed area distributed evenly throughout the railing.
- iii) Balconies shall not continue uninterrupted along a façade.
- iv) Weather protection, such as awnings, canopies or building overhangs on facades facing sidewalks, shall be a minimum 5 feet in depth, but should occupy no more than 2/3 of the total sidewalk width. The depth should depend on its function. Canopies or awnings shall have an overhead clearance between 8 to 12 feet. Vinyl or plastic awnings, and translucent awning with interior lighting are not permitted.
- v) Weather protection shall be a permanent architectural element. Materials and details must relate to the building as a whole.

- vi) Blank walls visible from sidewalks, pedestrian walkways and parking areas shall be designed to reduce the negative visual impact of large, undifferentiated exterior building walls and provide visual interest.

c) Wall Cladding

There are no Wall Cladding standards (see Façade: wall cladding guidelines).

d) Windows

- i) Reflective glazing shall not be used. See guidelines for solar control glazing alternatives under Façade: window guidelines.
- ii) Where multi-pane windows are utilized, "true divided light" windows or sectional windows shall be used. "Snap-in" muntins (i.e. detachable vertical or horizontal glass pane dividers or glass pane dividers sandwiched between layers of glass) shall not be used.

e) Main Entrances

- i) To contribute to the public and pedestrian realm, building entrances shall be prominent and easy to identify.
- ii) The main pedestrian entrance shall be easily visible and recognizable, and shall be architecturally treated in a manner consistent with the building style.
- iii) At mixed-use buildings, entrances to residential, office or other upper story uses shall be clearly distinguishable in form and location from retail entrances.

f) Secondary Entrances

- i) Secondary entries, such as side or rear building entries shall not be more architecturally prominent or larger than the front entry.

g) Loading and Service Entrances

- i) Service entrances shall not face primary streets when a side street, rear street, alley, or parking lot entrance location is possible.
- ii) All service entrances and associated loading docks and storage areas shall be located to the side or rear of the building and shall be separated and architecturally screened from any pedestrian entrances
- iii) Portions of the building façade containing service or truck doors visible from the public street shall be designed to include attractive and durable materials and be integrated into the architectural composition of the larger building façade design. Architectural treatments, materials, and colors shall be extended from building façade areas into the façade portion containing truck doors to avoid creating a gap in architectural expression and to maintain a high-quality appearance.

h) Entrance Doors

There are no Entrance Doors standards (see guidelines).

i) Parking Structure/Garage Doors

- i) Garage door shall be recessed a minimum of 12" from the face of the façade wall within which it is located.

2. Façade Guidelines

a) Building Base

The guidelines outlined below are intended to supplement and provide additional direction for the street façade base standards set forth in Section 18.28.102.1. Building Height Missing Regulations, as described in the Base Element subsection of Street Façade Height Missing Elements.

- i) Base treatments on additions and accessory buildings should be carried over from the primary building.
- ii) A base treatment should occur at both of the following scales on commercial buildings:

(1) At the scale of the pedestrian (i.e. within the ground floor portion of the façade), a base treatment should be created at a height between nine inches and six feet.

(2) At the scale of the building, the façade of the entire ground floor (or up to the second floor, depending on the height of the building) should be designed to read as a base that "anchors" the building (i.e., the portion of the façade above) to the ground.

iii) At nonresidential buildings, the building base should be created by any one or combination of the following treatments:

(1) A horizontal projection (or visible thickening) of the wall surface, which may be accompanied by a change of material and/or color; this may be an exterior version of a "wainscot."

(2) A "heavier" design treatment, such as a darker color and/or stronger, more permanent material, for the base portion of the façade than for the portions above.

(3) A horizontal architectural line or feature at or below the top of the first story, such as a belt course or secondary cornice (related to or repeating the pattern of an upper cornice) separating the first two floors.

(4) A ground level arcade with columns may be used to create a building base. Column spacing should be regular, and related to the structural bay increment of the building.

iv) At residential buildings, a building base may be created by any one or combination of the following treatments:

(1) A visibly thicker and continuous base portion of the wall along the ground, where the wall above the base sets back.

(2) A material and/or color change of the base wall relative to the building wall above. The base material should generally be heavier (e.g. of darker color and/or a heavier or more permanent material) than portions of the building above.

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

2. Façade Guidelines (Cont.)

incorporated into the canopy soffit, which has either a low level light source or one not directly visible to pedestrians.

- ① (4) Trellises, Marquees and Architectural Canopies: Materials, colors, and form should be derived from the building's architecture, e.g. a trellis painted the same color as a building's trim scheme is appropriate.
- (5) Ornamental wall-mounted outdoor lighting (sconces) may be used to accent entries, mark a sequence of repeating pilasters, or serve as a "centerpiece" for a façade panel. Style and material should be consistent with that of the building.
- (6) Protrusions such as balconies and porches may be used on second and higher stories if the overall projection and encroachment into the public right-of-way and/or required setbacks conforms to the regulations established in Section 18.28.044.1.c.ii. Front Yard Setback. Protrusions of this type should extend no greater than two feet from the face of the building. Alcoves used in conjunction with these elements increases the usability of this element, while providing shadow and visual interest to the façade composition.
- (7) Balconies or alcoves that are recessed into the building façade may use a low wall with open railing at top.
- ② (8) Balconies and porches should be constructed of materials and proportions related to the overall façade composition. A contrasting material to the wall surface should be used.

c) Wall Cladding

- i) Descriptive Definitions and usage recommendations:
 - (1) Brick: Red brick is the characteristic brick color in Tukwila and its region, although yellows, tans and browns are occasionally used as well. Full size brick is preferable to thin veneer brick. When used, brick veneers should be mortared to give the appearance of full-depth brick. Detailing should avoid the exposure of sides of veneer tiles; wrap-around corner and bullnose pieces should be used to further minimize the appearance of veneer. Brick wall cladding is frequently complemented by light-colored (white, off-white, light gray) accent materials such as limestone, glazed terra cotta tile, precast concrete, and/or glass fiber reinforced concrete (GFRC). Accent materials are typically used at window and door frames, wall bases, cornices, and as decorative elements. Other accent materials such as granite, river rock or colored

glazed terra cotta are also occasionally used.

- (2) Ceramic tile: Glazed and unglazed tile should be limited in use to a façade cladding or decorative wall accent material. Simple color palettes and design motifs should be used.
- (3) Fiber-Cement or Cementitious Siding: An exterior siding product available in planks, panels and shingles and composed of portland cement, ground sand, cellulose fiber and sometimes clay, mixed with water and cured in an autoclave. They may be an acceptable substitute for wood siding when used in the formats described below under "Wood." Extra care and training must be taken to ensure proper installation, proper tools are used for cutting, and non-rusting hardware is used for fastening. Earlier generation wood siding substitute products such as hardboard, oriented-strand board and asbestos board should not be used.
- (4) Fiber-reinforced plastics (FRP), cast glass fiber composites ("fiberglass"): These materials are often used in molded reproductions of carved wooden or cast metal architectural ornamentation such as architectural columns, capitals and bases, cornices, and other trim. They may be used if their appearance closely approximates the type of painted wood element they are simulating, and are coordinated in color and composition with the selected architectural style. They should only be used at locations above the reach of pedestrians.
- (5) Profile, Corrugated, and Other Sheet, Rolled and Extruded Metal Surfaces: Where used, sheet metal should be detailed with adequate thickness to resist dents and impacts, and should have trim elements to protect edges.
- (6) Stone (including river stone), stone veneers, cast stone, terra cotta, precast concrete, glass fiber reinforced concrete (GFRC): As well as wall cladding, these materials should be used as a wall base or wainscot materials and for copings, trim, and special decorative elements. Improperly simulated or contradictory finishes (i.e. use of panelized concrete to simulate a riverstone wall appearance with visible straight-line joints cutting across individual stones) should not be used.
- (7) Stucco or EIFS (Exterior Insulating and Finish Systems): Close attention should be paid to detail and trim elements for a high quality installation. For EIFS, high-density versions should be specified at ground floor level to resist impacts. Very stylized or highly textured surfaces are strongly discouraged. Joint patterns should be architecturally coordinated with overall façade composition. Ground floor level window and door trim elements should not be made from stucco, cement plaster or EIFS; they should instead be made of wood, metal, precast concrete or other contrasting durable materials.

(8) Wood: Horizontal sidings such as clapboard and tongue-in-groove; vertical siding such as board and batten; and other horizontal sidings such as smaller wood shingles may be suitable. The larger, more rustic styles of shakes should not be used. Trim elements should be used for all wood siding types. Timber detailing and exposed bracing may be appropriate. "T1-11" plywood panel siding is not recommended unless detailed with additional trim to emulate a board and batten style and must be of a smooth grade to avoid a rustic, textured appearance.

(9) Precast Concrete: The location and spacing of panel and expansion joints should be incorporated into the façade composition. Castings should be shaped to form architectural profiles that create bases, cornices, pilasters, panel frames, and other elements contributing to façade composition and human scale. Cement type, mineral pigments, special aggregates and surface textures may be used in precast concrete to achieve architectural texture and variety.

(10) Poured-in-Place Concrete: Long surfaces of uninterrupted flat concrete walls should not be used. The use of textured form liners, pigments, stains, and/or special aggregates should be used to create visual interesting surfaces. At a minimum, the design of exposed concrete walls should incorporate the location and spacing of formwork tie-holes, expansion joints and control joints into the façade composition. To the degree possible, formwork should shape architectural profiles of walls that create bases, cornices, pilasters, panel frames, and other elements contributing to façade composition and human scale. Concrete walls may also be clad with other finish materials such as stucco and patterned to match other building walls. The architectural treatment of poured concrete that is used as a building architectural base should be extended to concrete used elsewhere in the project for sitework material.

(11) Concrete Block: Where concrete blocks are used, creativity in selecting block sizes, surface textures, stacking/bonding patterns, and block and grout colors should be used. In the case of a building base, façade composition should be coordinated with the architecture of primary building walls above. To avoid an institutional (i.e. "project" or "prison") appearance, a plain stack-bond block pattern of standard size blocks should not be used. Decorative treatments such as alternating block courses of differing heights, contrasting grout colors, alternating surface textures (e.g. precision face and split face) and/or compositions of colored blocks should be used, along with matching cap and trim pieces.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

2. Façade Guidelines (Cont.)

ii) Guidelines

- (1) Local and recycled building materials should be used whenever possible.
- (2) Materials used should be appropriate to the architectural style and building type. Authentic materials and methods of construction should be used to the degree possible. Where simulated cladding materials (e.g. artificial stone to substitute for real stone, or painted fiber reinforced plastics to substitute for painted wood) are used for reasons of economy, they should be durable and closely match proportions, surface finishes, and colors of original materials.
- (3) Wall cladding materials on additions and accessory buildings should be carried over from the primary building where possible.
- (4) If the building massing and pattern of windows and doors is complex, a simple palette of wall materials, textures and/or colors should be used. If the building volume and the pattern of wall openings are simple, additional wall materials, textures and articulation may be utilized.
- (5) For individual buildings or portions of buildings intended to appear as individual buildings, materials used as primary cladding should be limited in number – one or two maximum in most cases.
- (6) Grout and sealant colors should be coordinated with colors of abutting materials as well as other building colors.
- (7) An anti-graffiti coating should be applied at the ground floor level and wherever exposed façade surfaces may be accessible from upper floors through wall openings. A clear matte finish is generally recommended for such coatings.

(8) Primary Commercial Building Wall Materials:

- (a) Brick: Red, tan and yellow brick colors are appropriate.
- (b) Wood: Horizontal sidings such as clapboard and tongue-in-groove may be used. Shingles and shakes should not be used. Heavy timber detailing and exposed bracing may be used where appropriate to the style.
- (c) Fiber-Cement or Cementitious Siding: Planks are an acceptable substitute for wood siding when used in the formats described above under "Wood." To match the precedents of real wood siding in the area the spacing of siding should not exceed 8".

(d) Profile and Other Sheet, Rolled and Extruded Metal:

As wall cladding, these wall systems should be used as a secondary or accent material. A high quality, durable, fade-resistant coating system or paint such as Kynar, Tnemec, etc. is recommended.

- (e) Stucco or EIFS: Stucco and EIFS finishes are acceptable finishes for upper stories only at street exposures on commercial buildings. They should not be used at storefronts. They may be used at ground floor portions of rear or side service and parking exposures and in such cases should be specified with high-density materials, with the ground floor street façade cladding materials continuing to be used as a building base and accent material.

(9) Primary Residential Building Wall Materials:

- (a) Brick: Red, tan, and yellow brick colors are appropriate.
- (b) Stone, stone veneers, cast stone, terra cotta, precast concrete, glass fiber reinforced concrete (GFRC): may be used as a wall cladding material, when detailed appropriately for residential character.
- (c) Stucco or EIFS: Stucco or EIFS finishes may be used only as a secondary material when combined with a contrasting primary cladding material such as wood siding or shingles, brick, or stone.
- (d) Wood: Wood should be widely used. Timber detailing and exposed bracing may be used where appropriate to the style.

- (10) Wall Accent Materials: are recommended to add interest and variety, for example, at architectural elements such as cornices and on portions of buildings or walls. Materials recommended for use as accents include brick, wood, stone, Fiber Reinforced Plastic, ceramic tile as listed above, in keeping with the architectural style of the building.

- (11) Building Base, Parking Podium or Above Ground Parking Structure Materials: Walls may use cladding, be built with materials that extend down from portions of the building above, or be built with contrasting materials of a more substantial character. Visible façades of Parking Structures, if not clad, should display quality materials of a substantial character that are complementary to surrounding architecture such as Precast Concrete, Poured-in-Place Concrete, and Concrete Block.

d) Windows

Windows should be designed to be in keeping with the character and the architectural style of the building. Windows throughout a building's façades should be related in design, operating type, proportions, and trim. They should be used as architectural elements that add relief to the façade and wall surface.

i) Form:

- (1) Window openings, operating types (single-hung, casement, etc.) and proportions of window frames and members should be designed in accordance with the building's architectural style.
 - (a) Where greater privacy is desired for ground floor restaurants or professional services, large storefront windows should be divided into smaller units or panes. An "industrial sash" type of multi-pane window may be used where appropriate with the building's architectural style.
 - (b) A vertical proportion of window openings (e.g., 3:2 to 2:1 height: width ratio) should typically be used. Openings may be composed of a series of vertically proportioned panes or frames.
 - (c) Commercial clerestory windows are a recommended feature in storefront glazing to provide natural light in conjunction with required height for shopfront.
 - (d) Windows should generally maintain consistency in shape and in location across a façade. Unifying patterns should include a common window header line or sill line, and/or aligned vertical centerlines of windows and doors. The overall effect should create a harmonious pattern across the street wall.
 - (e) Windows on the upper floors should be smaller in size than storefront windows on the first floor, and should encompass a smaller proportion of the façade wall surface area. Exceptions to this may occur when large window openings are used as "penthouse" glazing (top floor of a four or more story building).
 - (f) At freestanding parking structures, long-span façade openings with a height: width ratio that is more horizontal than 1:3 should not be used. Vertically proportioned window-like openings (3:2 to 2:1 ratio) are strongly encouraged, to continue the pattern of pedestrian-scaled building façades. If horizontally proportioned openings are used, vertical pilasters, columns, or other elements should be applied to subdivide the horizontal proportion into smaller vertically proportioned openings.

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

2. Façade Guidelines (Cont.)

(2) Glazing:

- ① (a) Window trim: Window frames and sills should be prominent and substantial to enhance openings and add additional relief. The size of elements should be proportional to the glass area framed, as where a larger window may use commensurately wider framing members. Upper story windows and parking structure "window" openings should be detailed with architectural elements such as projecting "lug" sills, and/or lintels.
- (b) Window accessories such as window boxes for plants, fabric awnings, etc. should be considered for additional articulation and interest, in coordination with the selected architectural style and building use. Decorative grillwork is a recommended option for parking structure openings, to add detail and help "break down" the scale.
- (c) At additions and accessory buildings, windows are recommended to be composed with the same architectural character as the main building, including opening mechanisms and trim.

(3) Materials:

- (a) At light duty horizontal or vertical aluminum sliding windows, assemblies with extrusions and frame members of minimum one and one-half inches exterior width dimension should be used to avoid an insubstantial appearance common to aluminum sliding windows; these should be accompanied by well-detailed frame and sill elements
- (b) Clear glass should be used. If tinted glazing is elected, light tints and green, gray or blue hues are recommended.
- (c) If solar or heat control is desired, low emissivity and nonreflective solar control glass, additive external and internal shade devices, and deep recessing of windows within walls are among the elements that can be used.
- (d) "Lug sills" (protruding window sills) should not be formed of rigid foam or other substrates sprayed with stucco or other wall finish material. They should instead be constructed with a permanent material such as painted wood, painted FRP, metal, precast concrete, GFRP, terra cotta, or stone.

e) Main Entrances

- i) Primary entrances are among the most visible and characteristic features of a building. The location and design of the main

entrance door(s) and the surrounding frame should be easily recognizable and should strongly represent the overall style and architectural character of the building.

- ii) Entrances should incorporate one or more of the following treatments:

- (1) Marked by a taller mass above, such as a modest tower, or within a volume that protrudes from the rest of building surface.
- (2) Accented by special architectural elements, such as columns, overhanging roofs, awnings, and ornamental light fixtures.
- (3) Indicated by a recessed entry or recessed bay in the façade. Recommended treatments include special paving materials such as ceramic tile; ornamental ceiling treatments, such as coffering; decorative light fixtures; and attractive decorative door pulls, escutcheons, hinges, and other hardware.
- (4) Sheltered by a projecting canvas or fabric awning, or as a permanent architectural canopy utilizing materials from the primary building.

- iii) Entrances to upper-story uses should incorporate one or more of the following treatments:

- (1) Located in the center of the façade between storefronts, as part of a symmetrical composition.
- (2) Aligned with prominent façade elements of upper stories, such as an expressed or embedded entrance tower.
- (3) Accented by architectural elements such as clerestory windows, sidelights, and ornamental light fixtures, and identified by signage and/or address numbering.
- (4) Indicated by a recessed entrance, vestibule or lobby distinguishable from storefronts.

f) Secondary Entrances

- i) Side or rear building entries should be visible and easy to find, but visually secondary to main entrances
- ii) Secondary entries should be easy to find, particularly for customers or visitors accessing them from parking lots.
- iii) The design of the side or rear entry should be architecturally related to the front entry, such as in use of materials and proportions.

- iv) Secondary entries should be enhanced with detailing, trim and finish consistent with the character of the building.

g) Loading and Service Entrances

- i) Loading and services entrances should not intrude upon the public view or interfere with pedestrian activities.

h) Entrance Doors

- i) Doors are the one part of the building façade that patrons and visitors will inevitably see and touch, and should be well-detailed and made of durable high quality materials.
- ii) Doors at storefronts should include windows of substantial size that permit views into the establishment.
- iii) Doors at storefronts should match the materials, design and character of storefront windows. High quality materials such as crafted wood, stainless steel, bronze, and other ornamental metals are encouraged.
- iv) Detailing such as carved woodwork, metal trim, or applied ornament should be used, to create noticeable detail for pedestrians and drivers. Doors may be flanked by columns, decorative fixtures or other details.
- v) Doors and doorways leading to upper story uses, such as residential or office uses should be distinguishable from those leading to retail establishments.
- vi) If utilized at storefront windows, doors, and loading docks, roll-up security doors should be detailed to conceal door housings and tracks and provide an attractive and finished appearance for all exposed components. The roll-up door housing should not protrude more than 6 inches from the building façade plane.
- vii) Doors at residential mixed-use buildings should match or complement the materials, design and character of the primary building, as well as convey the residential character of the building.
- viii) Doors at residential uses should incorporate high quality materials such as crafted wood, stainless steel, bronze, and other ornamental metals.
- ix) At home occupation units, if roll-up security doors are used, they should be detailed to conceal door housings and tracks and provide an attractive and finished appearance for all exposed components. The roll-up door housing should not protrude from the façade plane.

i) Garage Doors

- i) For residential garage doors at mixed-use buildings and for all commercial use garage entrance doors, garage doors should avoid projecting an automobile-dominated appearance to the street or alley by using scale-reducing design treatments as follows:

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

2. Façade Guidelines (Cont.)

- 1) Garage doors should be single car width (i.e. up to 10 feet width maximum) wherever possible, rather than double-car width.
- 2) Garage doors that face the public right of way should have window openings or open grillework at the upper portion of the door, or throughout the entire door surface. Where double car width doors cannot be avoided, door width should not exceed 18 feet.
- 3) Door design treatments such as vertically proportioned segmentation and detail should be used to minimize the apparent width of the entrance – in accordance with the selected architectural style.
- 4) Framing elements such as trellises above openings and trim around the edges of openings are recommended.
- 5) At home occupation unit façades, garage or studio doors should be compatible with a residential character. Large featureless doors should be avoided. Glazed multi-panel doors may also be used to impart a residential scale.
- 6) At Parking Podiums and Freestanding Parking Structure, vehicle entrances should be treated with architectural articulation and landscape materials to "mark" important and frequently used common entrances and make them easily recognizable, consisting of one or more of the following treatments, consistent with the architectural style of the building:
 - (a) Indenting or recessing the door at least one foot from the surrounding façade of the structure or podium.
 - (b) Applying architectural framing to the opening.
 - (c) Applying trellises above or around the opening, with or without plant material.
 - (d) Ornamental door grillework,
 - (e) Ornamental lighting and signage.

3. Roof Standards

- a) **Roof Types**
 - i) Flat or shallow pitched roofs are permitted to be used and shall be designed with one or more of the treatments outlined in Roof Type Guidelines.
 - ii) Mansard roofs (i.e. a flat-topped roof that slopes steeply down on all four sides, thus appearing to sheath the entire top story of the building) shall only be acceptable as follows:

(1) The height of a building with a mansard roof shall be as defined in Section 18.28.031 Building Height.

(2) The maximum slope shall be no steeper than three feet of rise for every two feet of run (3:2).

(3) The minimum height of mansard roofs (from eave to roof peak) shall be one typical building story height or 30% of the building façade height as measured to the eave, whichever is smaller.

(4) Mansard roofs shall fully enclose the perimeter of a building. Where a break in the horizontal run of mansard roof occurs, an architectural termination is required (e.g. the roof intersects into a tower).

(5) Mansard roofs shall include a cornice at the eave line where the roof overhang depth is less than two feet, and an edge termination at the peak.

b) Roof Materials

There are no Roof Materials standards (see guidelines).

c) Roof Equipment and Screening

i) All building mechanical equipment located on roofs shall be screened from view - as seen from public streets and sidewalks within 300 feet of the subject property, except from points of view in excess of 10 feet above finished site grade of the subject property.

ii) Rooftop equipment must be set back a minimum of 10 feet from building walls, screened on all sides, and integrated into the overall building design.

iii) Roof mounted equipment such as cooling and heating equipment, antennae, and receiving dishes shall be screened by architectural enclosures that are derived from or strongly relate to the building's architectural expression, or enclosed within roof volumes.

iv) Roof mounted solar panels which match roof slopes and are flush with roof surfaces, or are incorporated into predominant roofing material (e.g. "solar tiles" or "solar shingles") shall be permitted.

v) To reduce glare, light colored roofs (including "cool roofs") shall be screened from view as seen from adjacent public streets and sidewalks by architectural enclosures that are derived from the building's architectural expression, such as parapet walls or other screening treatment.

4. Roof Guidelines

a) Roof Types

i) All pitched and continuous sloping roof forms (i.e. without flat horizontal portions) are encouraged. These include gable, hip, and pyramidal roofs.

ii) Flat or shallow pitched roofs should be ornamented with shaped parapets, caps, or cornice treatments, using one of the methods below:

(1) The primary cornice should be decorated or bracketed with parapets, finials, or simple decorative panels or molding.

(2) An architecturally profiled cornice and/or expressed parapet cap should be used to terminate the top of the parapet wall.

(3) Surface mounted cornices, continuous shading elements, or trellises should be used to strengthen a parapet wall design.

(4) Sheet metal parapet caps or coping should provide a formed (compound folded) overhanging edge termination and a heavy gage sheet metal thickness selected to avoid "oilcanning" distortion. Single layer, flush sheet metal parapet caps should not be used. Finish should either be of an unpainted ornamental metal such as copper, or painted to match adjacent wall surface. Unpainted galvanized metal should not be used.

iii) Roofs on additions and secondary buildings should match the roof of the original building in terms of materials, slope, detailing and style, to the degree possible.

iv) Smaller, subsidiary roofs may be used at storefronts; these should match the principal building in terms of style, detailing and materials.

v) Roof overhangs for both flat and sloping roofs are encouraged to add depth, shadow and visual interest, and can be used to create a Street, Pond and River façade Top Element as defined in Section 18.28.102.1. They should be designed as follows:

(1) At roof overhangs, vertical roof edge fascia over eighteen inches in height are recommended to be subdivided or accented by additional horizontal layers, stepbacks, trim, and other detailing.

(2) Brackets and corbels (i.e. decorative supporting pieces designed to bear the weight of projected overhangs), or other expressed roof overhang supports (whether structural or nonstructural) are encouraged to add richness to detailing. The spacing module of repeating supports should relate to the building's structural bay spacing or window mullion spacing.

BOOK III: IMPLEMENTATION STRATEGY AND ACTIONS

① The success of the Urban Center will be supported by the city actions and investments outlined in this chapter of the Tukwila Urban Center Plan. Unlike private investment, City actions and investments can be strategically timed, scheduled and directed to specific areas and projects to further revitalization. The intertwining of regulatory control (contained in Book II) with the strategic investment of limited public resources (planned in this chapter, Book III) is intended to accelerate the redevelopment strategies (contained in Book I) and add to the appeal and success of Southcenter as a great place.

City actions will be guided by the Goals and Principles described in Book I, flexible enough to allow for opportunities that cannot be predicted, and clear enough to prioritize actions and investments on an ongoing basis. As vision becomes reality, new and different actions may be required and implemented. **Planned projects will be undertaken as opportunities and resources permit.**

Capital Improvement Projects & Actions

The City will invest in capital improvements or will work jointly with the public sector and/or private sector to create public spaces, new streets, and streetscape conditions that are supportive of envisioned development, will enhance the pedestrian environment, and create an attractive setting for the City's urban center. Table 3.1 Capital Improvement Projects & Actions identifies a set of actions and capital improvement projects related to transportation, circulation, and pedestrian amenities that will benefit the Urban Center and support the anticipated levels of development.

- The Public Space and Amenity projects are specifically intended to instigate the types of land use changes in the northern part of the TUC that are envisioned by the community – attracting housing, stimulating a new level and quality of development within the TUC, creating more pedestrian-friendly areas, and strengthening pedestrian connections between activity areas.
- The actions related to Streets, Circulation and Mass Transit are required to support the goals of the TUC Plan for enhancing access for transit and automobiles, breaking up the mega-blocks in the planned pedestrian-oriented areas, improving circulation within and access to the urban center, improving transit service and facilities, and enhancing streetscapes.
- The Bicycle and Pedestrian Facility projects are intended to extend the network of existing trails and paths within the TUC, connect activity areas (including Tukwila Station, the Green River and Tukwila Pond to neighborhoods and shopping areas), and provide a viable transportation alternative to the car as the area becomes more pedestrian-friendly.

These actions are prioritized in terms of level of need and timing. Table 3.1 Capital Improvement Projects & Actions should be viewed as a flexible planning tool that allows re-prioritization of projects based on available resources and changing circumstances, needs and conditions. More detailed project descriptions of the identified capital improvements are provided in the following sections.

Exhibit C - Westfield 6/1/09 Comments (See Exhibit B for specific proposed text changes)

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

i) Elements:

- (1) Location: This esplanade shall be located along the pond's northern shore, and stretch from the park along the western side of the pond to the public sidewalk on Andover Park West on its eastern end.
- (2) Orientation: The esplanade shall be connected to Strander Boulevard and to the Mall along a grand public street, designed with public amenities and preferably with a central median as a linear open space connection.
- (3) Dimensions: The esplanade shall be a minimum twenty-five (25) foot wide.
- (4) Lighting: Sufficient lighting will be provided to create a safe and pleasant night-time environment. Along the esplanade, pedestrian height double-head pendant street lights shall be provided at a maximum spacing of every 60 feet.
- (5) Amenities: Street furnishings such as benches, trash receptacles, kiosks and stands for vendors, banners, and flowering pots will be integrated into the design.
- (6) Design: The northern esplanade is envisioned as an urban water edge, with hardscape, street trees and lighting, and other street amenities. The creation of a grand monument at the lynchpin of the Mall connection and the pond edge is recommended as a focal point and central gathering place. The pond edge beyond the esplanade shall maintain the pond's riparian environment. The design and materials of the esplanade should reflect the character of the Pacific Northwest, with wood deck and railings to reflecting Pacific Northwest design character - see Section 18.28.085.
- (7) Accessibility: The esplanade shall meet all ADA requirements.

3.1.4 TUKWILA POND WATER QUALITY

Tukwila Pond suffers from poor water quality, primarily due to elevated levels of phosphorus, which cause algal blooms in the dry summer and early fall months. This is due to a combination of factors that include: lack of freshwater input and air circulation through the pond in the dry months of the year; inputs of phosphorus from seasonal stormwater run-off, and accumulation of phosphorus in the sediments of the pond during the year, which serve as an ongoing "source" of this nutrient to the pond water. In addition, the lack of shade and the shallowness of the pond allow high water temperatures in the summer and light penetration through the whole water column, both of which promote algal growth. These conditions also contribute to low levels of dissolved oxygen in the water, a factor that limits fish and other aquatic organisms and can cause fish kills. Algal blooms, in addition to being visually unattractive, can cause unpleasant odors and can become toxic (to pets or humans, if ingested).

1) Short Term Actions

Water quality improvements to be implemented by the City shall include the following measures:

- i) Alum treatment (a substance that is pumped into the pond, settles to the bottom and prevents phosphorus from being released into the water column);
- ii) Air circulation using pumps to push air out into the pond along lines laid on the bottom to improve the levels of dissolved oxygen in the water; and
- iii) Aquatic vegetation plays a significant role in the water quality of ponds. An increased variety of aquatic vegetation to use excess nutrients, along with the installation of shading wetland vegetation, would moderate algal blooms in the pond, while also increasing diversity for wildlife enhancement.

2) Mid Term Actions

- i) The City will work with property owners on the north side of the pond to improve the functioning of the existing stormwater treatment system (bioswales) thus increasing the retention of phosphorus and other pollutants.

3) Long Term Actions

- i) Once the alum injection and air circulation systems are installed, the City will monitor water quality and will continue to operate the systems during the summer and fall months to maintain the desired water quality in the pond.
- ii) The City will monitor performance of the stormwater bioswales.
- iii) Over the very long term, install alternative stormwater treatment as the area on the north redevelops.

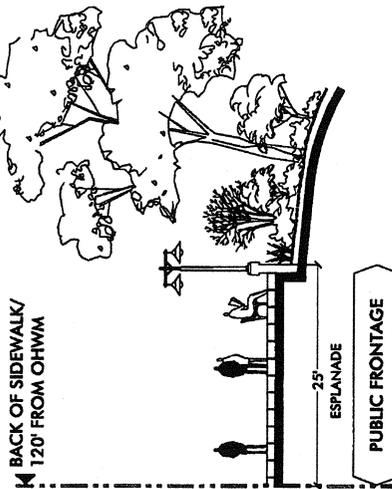


FIG. 3.1.3 TUKWILA POND ESPLANADE SECTION

3.1.5 PUBLIC PARKING STRUCTURE

1) Short Term Actions

a) Feasibility and Location Study

Currently an adequate supply of parking exists within the TUC. However, as the area designated for a more urban mix of uses in the TUC intensifies, and businesses are faced with the physical limitations of surface lot and on-street parking, there will be a growing demand for an increase in the supply of conveniently located parking. A public parking structure located on a site in the area designated for pedestrian-friendly, walkable development north of Strander Boulevard, would allow visitors and shoppers to park once and walk to their destinations, and provide additional needed capacity for future growth. The City shall prepare a study investigating the overall feasibility of developing a public parking structure on a site located north of Strander Boulevard in the TUC area, and to determine the most feasible and strategic site for the structure. The study should include the following tasks:

- An assessment of current and future parking demand in the area;
- Parking structure site criteria and analysis;
- Recommendation of preferred site(s) for a parking structure;
- An assessment of the potential for integration of mixed uses into the site(s); and
- Preliminary identification of costs and possible funding sources (e.g., public/private partnership).

3.1.6 MULTIFAMILY HOUSING INCENTIVES

1) Short Term Actions

In addition to investing in amenities that are needed to attract housing (such as enhancing Tukwila Pond and constructing the Riverwalk along the Green River), the City will research the feasibility of implementing financial incentives that would further encourage multifamily housing development in the TUC. One example of this type of program is the multifamily tax abatement program, which forgives property tax payments for a period of time.

3.3. MASS TRANSIT NETWORK AND FACILITIES

Capital projects and service enhancements related to transit are intended to better meet the needs of the communities, residents, employees, employees, and visitors to and within the TUC area. Overall goals are to improve and maximize usage of all transit service in the area, make service faster and more efficient, and assist the TUC meet its development potential.

3.3.1 CAPITAL IMPROVEMENTS

- 1) **Short Term Actions**
- a) **Southcenter Transit Center (King County Metro project)**

The Tukwila Transit Plan (2004) calls for relocating and improving the existing transit center at the intersection of Andover Park West and Baker Boulevard. This location is both adjacent to Southcenter Mall, a major destination for both shoppers and employees, and at the western end of the "Mall to Tukwila Station corridor". The new transit center should be an on-street facility with expanded transit capacity, high quality waiting facilities, and enhanced pedestrian infrastructure that will promote transit ridership and improve passenger safety and security. Construction of the new Transit Center should include the following:

- An expanded southbound stop on Andover Park West featuring three bus bays with independent pull-in/pull-out
 - A relocated northbound stop on Andover Park West featuring two bus bays with independent pull-in/pull-out
 - An improved curbside stop on Baker Boulevard for eastbound routes
- In addition, the existing waiting area should be improved to incorporate the following features:
- **Widened Sidewalks** – During large parts of the day, the existing sidewalk is crowded with waiting passengers. Passengers spill into the Mall parking lot to avoid the crowded sidewalk conditions. Sidewalk width should be widened by at least 4 feet to 14 feet wide.
 - **Sitting Areas** – Currently, there are few opportunities for waiting passengers to be seated. Visual inspection has showed that waiting passengers often sit on the curb separating the sidewalk and the Mall parking lot.
 - **Shelters** – There are two standard sized shelters at the existing Southcenter Mall stop. Given over 1,000 daily patrons at this stop, two shelters provide inadequate shelter. A larger canopy type shelter should be considered in lieu of adding additional standard transit shelters.

- b) **Permanent Tukwila Commuter Rail Station (Sound Transit project)**

The City will continue coordinating with Sound Transit on the design and construction of a permanent Tukwila Commuter Rail/Amtrak station to ensure that the final design incorporates the railroad track relocation of the Union Pacific railroad, the extension of Strander Boulevard, and off-site stormwater detention and treatment, and preserves the opportunity for redevelopment of the site with more intensive mix of transit-supportive uses that complement the City's plans for surrounding transit-oriented development. The station design shall include a direct connection to the pedestrian path crossing West Valley Highway and the Green River, and leading to the Mall.

The City shall also strive to ensure that the Station becomes more visible in the community and acts as an anchor for a Transit Oriented Development. This will necessitate changing the station design from its current auto-oriented incarnation into more of a pedestrian destination. A more placemaking, visible station should lead to increased ridership. In addition, a visual connection between Tukwila Station and the Tukwila Urban Center are vital to address the public perceptions that no connections between the two locations exist.

The City shall pursue construction of an access ramp from Strander Boulevard overpass to the Tukwila Station as part of Sound Transit's permanent station planning, design and construction. In addition to improving auto and transit access to the Station, such an access will provide travel time advantages if an I-405 Bus Rapid Transit (BRT) route serves Tukwila Station.

- e) **Bus Shelters in Locations with High Ridership (King County Metro project)**

The City will pursue having Metro Transit install bus shelters at stops with high ridership where facilities do not currently exist. Within the TUC, there are three locations where shelters are warranted; the relocated northbound stop on Andover Park West, and on both east- and westbound Strander Boulevard just west of Andover Park West. The City will pursue a design that ensures that the shelters architecturally fit in with the rest of the corridor.

2) Mid Term Actions

- a) **TUC Trolley**

The City shall pursue the development of a rubber-tired trolley route connecting Tukwila Station with other activity areas (including shopping, hotels, parks and employment areas) in the TUC. A trolley that is frequent (every 10 minutes or better) plus fun (either a modern futuristic design or a classic wooden trolley replica), will improve frequency of service between the Station and the TUC, and attract people to park once in the TUC and use the trolley to visit other destinations. This approach has been used successfully to carry passengers and enhance the image of other lifestyle centers, downtowns, and suburban shopping centers.

Because it is unlikely that a TUC Trolley will rank highly as part of King County Metro's overall South King County transit priorities, the City shall pursue public/private partnerships with local businesses in the TUC as a means of funding.

3.3.2 SERVICE IMPROVEMENTS

- 1) **Short Term Actions**

- a) **Route span, frequency & routing improvements (King County Metro project)**

To improve mobility and better serve existing and projected travel patterns, the City shall continue pursuing improvements in span, frequency, and routing for Routes 126, 128, 140, 154 & 155 with King County Metro. A more complete description of these improvements can be found in the Tukwila Transit Plan (2004).

- b) **Sounder Commuter Rail Service (Sound Transit project)**

Sound Transit's Sounder commuter rail service currently serves the Tukwila Station with four northbound/southbound trains in the morning and four southbound/northbound trains in the afternoon. The service runs between Tacoma and Edmonds. The City will support Sound Transit's long range commuter rail service plans for 16 roundtrips per day starting in September 2008, and 18 roundtrips per day beginning in June 2009. The City will also coordinate with Sound Transit on ensuring sufficient parking is provided at the station, and with Metro on providing appropriate transit connections and service, as commuter rail service levels increase.

2) Long Term Actions

- a) **Amtrak Service (Amtrak project)**

Amtrak Cascades service, running between Eugene, Oregon and Vancouver, British Columbia, currently serves the Tukwila Station with three trains in each direction daily. The City will support Amtrak's future plans include increasing service to 26 trains per day by 2023. The City will also support accommodating Amtrak's request for a shelter for Amtrak passengers at the Tukwila Station, as part of the permanent station planning and design.

- b) **Bus Rapid Transit (King County Metro project)**

Two different Bus Rapid Transit (BRT) processes have been proposed for the TUC. The King County Metro BRT line outlined in the existing Six-Year Plan would connect Federal Way with SeaTac-Airport and Tukwila Station. One of the options for the I-405 BRT Study connects Renton and Bellevue with Tukwila Station and the TUC.

For the purposes of long-range transportation needs, both alignments are necessary to provide high capacity transit to the TUC and to provide an all-day destination for the BRT. Park-and-rides will not generate all-day ridership for transit lines – active land uses such as the TUC will.

Routing for the BRT through the TUC should follow Strander Boulevard between Tukwila Station and Southcenter Mall, and continue north to the Airport via Strander Boulevard, Klickitat, and SR 518. For the purposes of this plan, either Sound Transit or King County Metro can operate either BRT line.

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

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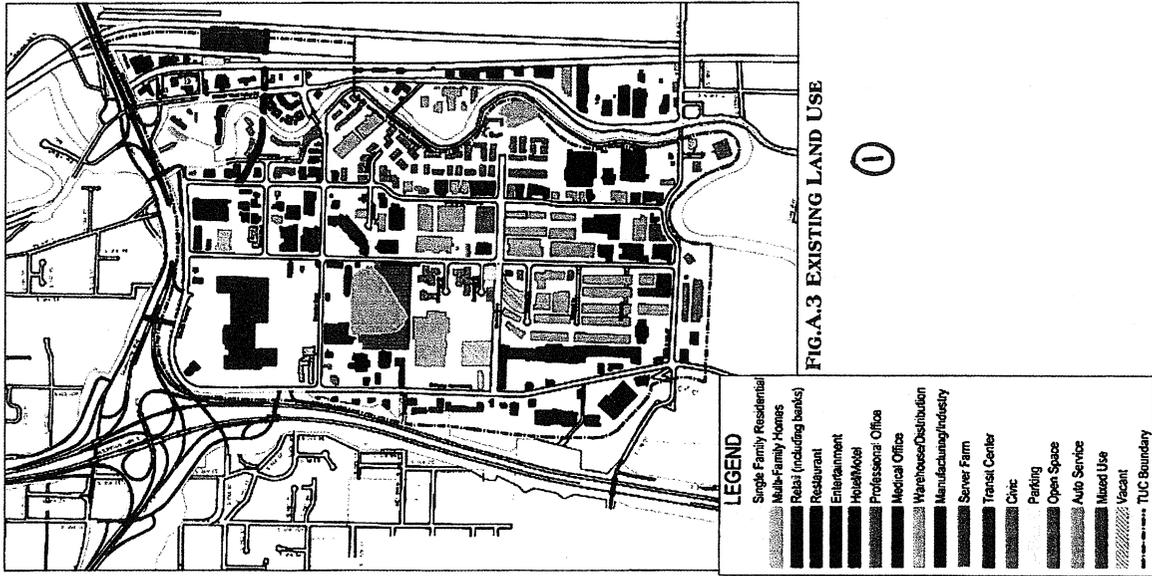


FIG.A.3 EXISTING LAND USE

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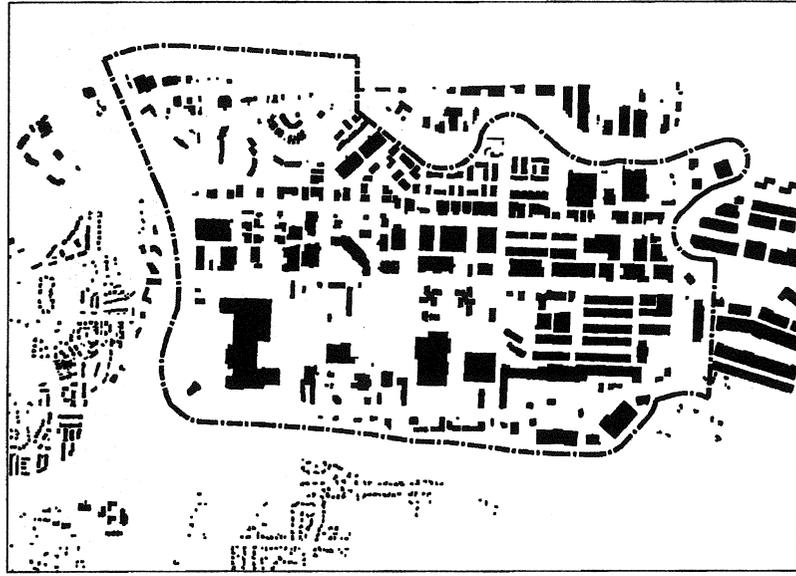


FIG.A.4 EXISTING BUILDING PATTERN

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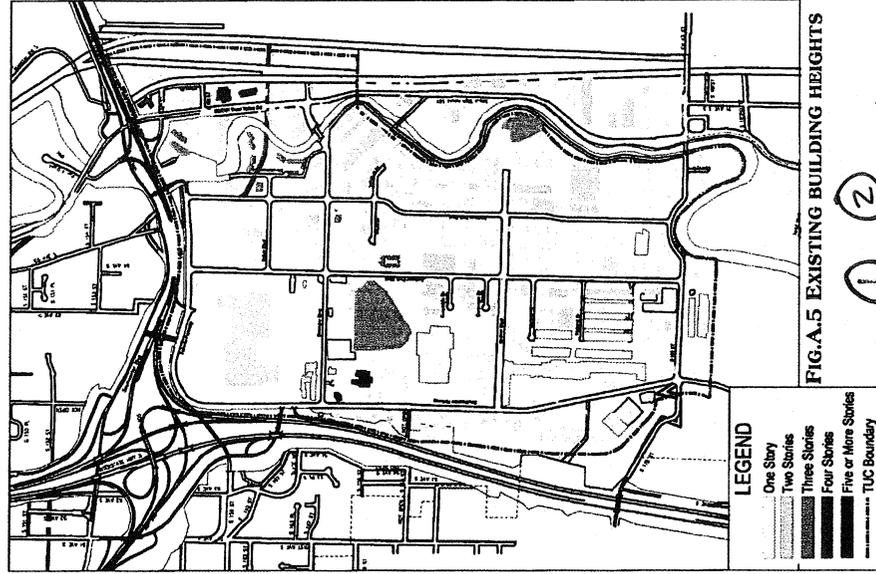


FIG.A.5 EXISTING BUILDING HEIGHTS

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Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

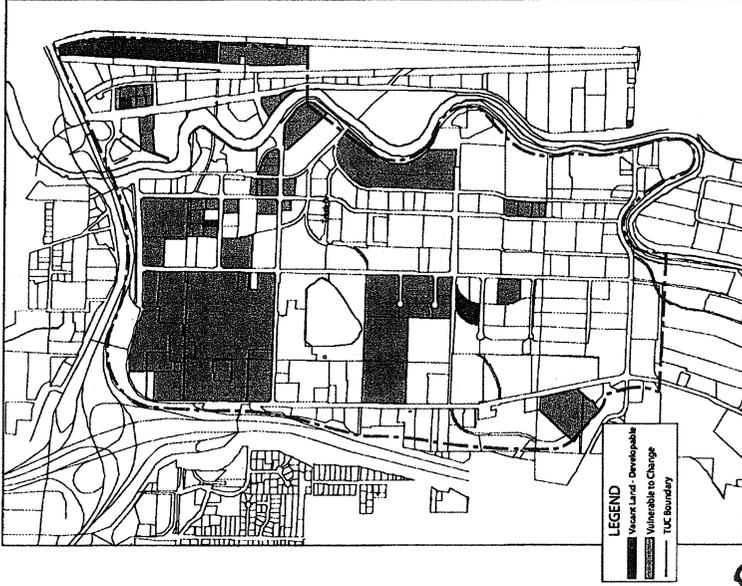
A.5 DEVELOPMENT AND REDEVELOPMENT POSSIBILITIES

Southcenter is almost 100% developed, with very little vacant developable land. The few areas that are untouched by development are either preserved as open space, environmentally sensitive wetlands and river areas, or dedicated towards public uses, such as utility sites. The most significant piece of vacant land that is available for new development lies on the eastern border of Southcenter, adjacent to the Tukwila Sounder Commuter Rail Station (see Fig.A.6 Vulnerability to Change).

While there is very little undeveloped land in Southcenter available for new investment, the low-density nature of its development pattern points toward redevelopment opportunities. Its high-visibility location at the juncture of two freeways makes it a desirable location, especially since there is little developable area elsewhere. The other quadrants bordering the freeway intersection are filled with low-density residential neighborhoods, with little to no land open for development.

With heightened demand for retail space in Southcenter, and the rising land values that result from this demand, much of Tukwila's industrial and warehouse space is vulnerable to conversion to office (see Photo 8) or retail. Some of Tukwila's industrial uses have already shifted to retail uses (see Fig.A.7 Patterns of Development and Change), as evidenced by Costco Wholesale, Lowe's Home Improvement, Home Depot and Circuit City, all of which are located in former warehouse buildings.

Specific areas identified by the City as possible sites for future redevelopment or infill include the retail parcels along Evans-Black Drive and Strander Boulevard, the Levitz Furniture warehouse at the southern end of Southcenter on Southcenter Parkway, and the parcels located just south of Tukwila Pond currently housing warehouse and office uses.



① FIG.A.6 VULNERABILITY TO CHANGE (2007)

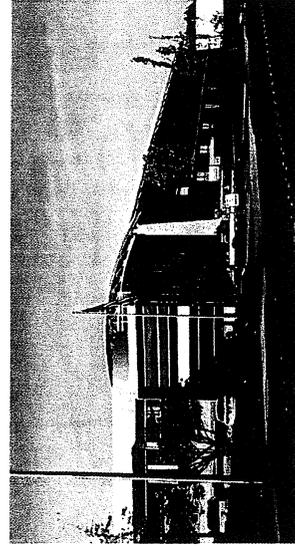


PHOTO 8

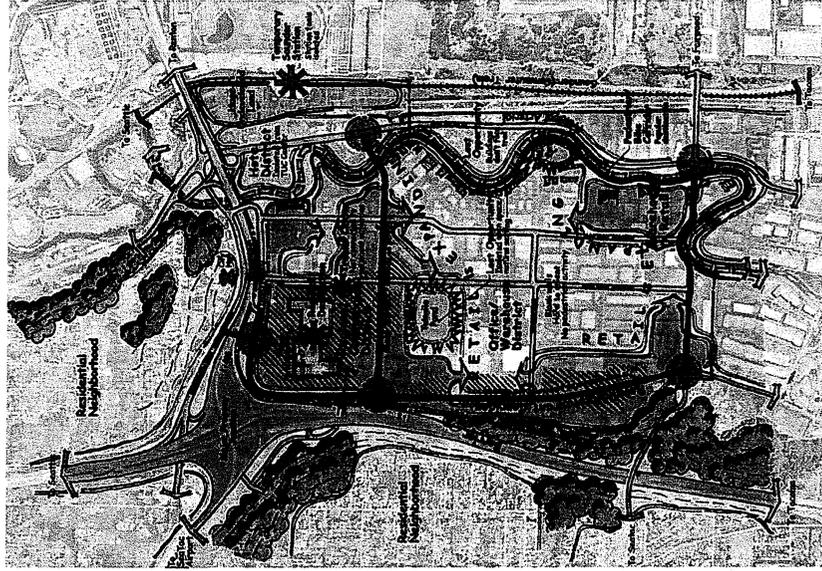


FIG.A.7 PATTERNS OF DEVELOPMENT AND CHANGE

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

2) Pedestrian Circulation

Pedestrian activity is almost nonexistent in Southcenter, limited to the brief walks taken by people walking to their jobs or to shopping destinations from transit. There are several reasons for this - a street network scaled to the automobile creating block sizes that are too large to walk (see Fig.A.9: Existing Blocks), long distances between destinations, narrow unprotected sidewalks along wide highly trafficked roads, and the fact that there are no residential uses in the area. In some areas, sidewalks were created as a part of adjacent development and end at the parcel limits, creating a pedestrian network that is interrupted and sporadic. Pedestrian access to the Sounder station is not clearly legible, but this should improve with the installation of a permanent station, and subsequent planned redevelopment of the area as a Transit Oriented Development (TOD). Access to park and open spaces in the area can be difficult to find on foot, and the primary pedestrian routes in Southcenter, the Green River and Interurban Trails, are hidden behind buildings for a good deal of their length.

3) Transit

Transit is provided to the area through King County Metro bus service, and Sound Transit's "Sounder" commuter rail service. King County Metro routes 110, 126, 128, 140, 150, 154, 155 and 160 serve the Southcenter area. Routes 110, 126, 140 and 154 all connect to the Tukwila Sounder Station during Sounder regular operating hours. Route 110 connects the Tukwila Station area at Longacres Drive with north Renton. Route 126 provides connections between Tukwila Station, Southcenter, west Tukwila, and South Seattle. Route 128 provides connections between Southcenter and White Center and West Seattle. Route 140 is a major east-west bus route connecting the mall to Burien, Sea-Tac Airport, and Renton. Route 150 is the major north-south route connecting Tukwila with Auburn, Kent, and Seattle. Route 154 serves the Boeing Industrial site and connects to the Sounder Tukwila rail station. Route 155 provides service between Tukwila and north Kent, and Route 160 provides service to downtown Seattle.

Sounder offers commuter rail service between Tacoma and downtown Seattle with stops in Puyallup, Sumner, Auburn, Kent, and Tukwila. An interim station is located just south of Longacres Way (see Photo 9); a permanent station is to be completed by 2012, and will accommodate Amtrak service as well as the commuter trains. A study by Mirai Associates indicates that transit accounts for about 2% of all trips into and out of the area. A great number of these trips are to and from the Westfield Southcenter Mall; the stop at this mall is the most highly used, and accounts for more than half of the total riders in the study area. Long-range plans for the regional Sound Transit light rail line include the possibility of a spur line to serve the Southcenter area. This, combined with a permanent Sounder station, (and its subsequent TOD development) should make transit a more appealing option for the area.



PHOTO 9



PHOTO 10

Exhibit C - Westfield 6/11/09 Comments (See Exhibit B for specific proposed text changes)

A.9 CONCLUSION

The Tukwila community has seen its presumptive "Urban Center" transform from farms and undeveloped open land to an industrial hub, and again to its current incarnation as an industrial and regional retail center. Southcenter is very successful as a commercial district - it is "the place to shop" for the City and a large portion of the region. Tukwila is the sixth-largest city in the state for sales tax collections, and most of those dollars come from the stores located in Southcenter, with up to two billion dollars worth of retail activity generated annually by retailers in the Southcenter area. However, the success of the district has led to rapid growth that has sprawled in haphazard fashion across the enormous land area of Southcenter, resulting in a diffuse and exclusively auto-oriented environment that is confusing to shopping and featuring little connection to the rest of the community.

Whereas Southcenter is the economic engine of the City, it does not function as any real center for the community. It is only active in the daytime, and there are few nighttime uses. Despite the presence of hotels in the area, there are only scattered dining and entertainment opportunities. Development within Southcenter is exclusively commercial. Developments are characterized by low-rise structures surrounded or edged by surface parking. There are very few places to gather or meet other than in the hallways of the Mall.

Southcenter is bound by substantial natural and manmade features that separate the district from the residential neighborhoods to its north and west, and from commercial development to the east and south. Because of a lack of other connections to the district, most people get to Southcenter by car. Its development pattern is entirely oriented to automobile, with very little consideration given to the pedestrian. Wide streets are unrelieved by trees or landscaping, and not enlivened by interesting signage or architecture. While the City's Zoning Code states that the TUC is intended to be "pedestrian-friendly", the large scale of the district's blocks and the stark quality of its streets create powerful disincentives to walking in the district. Sidewalks are inconsistent and narrow. Street crossings are few and far between, and the streetlights are timed for cars, not for pedestrians. This pattern of development is vulnerable to loss of value likely to stem from increasing gasoline prices and the popular embrace of sustainable pattern of development.

The City of Tukwila is a memorable natural setting, and Southcenter has several notable, if hidden, resources, including Tukwila Pond, Minkler Pond and the Green River. But these resources have thus far been a missed opportunity for the district - hidden from view, difficult to access, and therefore rarely used by most of the City's population. Aside from these amenities, few natural site features remain - most have been developed and paved over with asphalt. Southcenter's visual character stands in stark contrast to the context that surrounds it - the incongruence between the green residential fabric of the City and the hard asphalt of its Urban Center is heightened by the lack of connections between them.

Tukwila's Urban Center does not reflect any design character that is indigenous to the region or to the City. Buildings are similar in height and massing, and no different than those that can be found at any successful retail center in the country. The streets that make up the network of Southcenter are indistinguishable from one another in both aesthetics and importance. There are no landmarks to indicate important locations and anchors in the district, and no visual or physical connections to link these places together. Unremarkable building design, spread-out development patterns, and undefined streetscapes contribute to the character of a "placeless" setting.

But the opportunities inherent in Southcenter are strong. The area is easily reachable from surrounding cities, with good access via the interstate freeways, and as result, the regional mall remains successful. The recreational and natural amenities of the area make good incentives for residential development throughout the district, providing potential anchors for new neighborhoods. A planned residential mixed use development adjacent to the Tukwila Sounder Station will provide an anchor for further residential development in Southcenter. Transit options, including the King County bus system and Sound Transit's commuter rail and the planned regional light rail, can be improved and built upon, and combined with an improved pedestrian realm to provide an alternative to automobile travel. All of these factors provide the framework for positive change and offer the opportunity to direct future growth, to make Southcenter a true "Urban Center" for its community. The *Tukwila Urban Center Plan* is intended to build upon and extend these assets while improving the character, connectivity and range of experiences offered in Southcenter for the community and the region.